

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2019-290-WS

In the Matter of:

**Application of Blue Granite Water
Company for Approval to Adjust
Rate Schedules and Increase Rates**

**DIRECT TESTIMONY OF
DYLAN D'ASCENDIS FOR
BLUE GRANITE WATER COMPANY**

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1 **I. INTRODUCTION**

2 **A. Witness Identification**

3 **Q. Please state your name and business address.**

4 A. My name is Dylan W. D’Ascendis. My business address is 3000 Atrium Way, Suite 241,
5 Mount Laurel, NJ 08054.

6 **Q. By whom are you employed and in what capacity?**

7 A. I am a Director at ScottMadden, Inc.

8 **B. Background and Qualifications**

9 **Q. Please summarize your professional experience and educational background.**

10 A. I offer expert testimony on behalf of investor-owned utilities on rate of return issues and
11 class cost of service issues. I also assist in the preparation of rate filings, including but not
12 limited to revenue requirements and original cost and lead/lag studies. I am a graduate of
13 the University of Pennsylvania, where I received a Bachelor of Arts degree in Economic
14 History. I also hold a Masters of Business Administration from Rutgers University with a
15 concentration in Finance and International Business, which was conferred with high
16 honors. I am a Certified Rate of Return Analyst (“CRRA”) and a Certified Valuation
17 Analyst (“CVA”). My full professional qualifications are provided in Appendix A.

18 **II. PURPOSE OF TESTIMONY**

19 **Q. What is the purpose of your testimony in this proceeding?**

20 A. The purpose of my testimony is to present evidence on behalf of Blue Granite Water
21 Company. (“BGWC” or the “Company”) about the appropriate capital structure and

corresponding cost rates the Company should be given the opportunity to earn on its jurisdictional rate base.

Q. Have you prepared an exhibit in support of your recommendation?

A. Yes. I have prepared D'Ascendis Direct Exhibit No. 1, which consists of Schedules DWD-1 through DWD-8.

Q. What is your recommended cost of capital for BGWC?

A. I recommend the Public Service Commission of South Carolina (the "Commission") authorize the Company the opportunity to earn an overall rate of return between 8.10%-8.36% based on a test year ending June 30, 2019. The ratemaking capital structure consists of 47.09% long-term debt at an embedded debt cost rate of 5.73%, and 52.91% common equity at my recommended range of common equity cost rates between 10.20% and 10.70%. The overall rate of return is summarized on page 1 of Schedule DWD-1 and in Table 1 below:

Table 1: Summary of Overall Rate of Return

<u>Type of Capital</u>	<u>Ratios</u>	<u>Cost Rate</u>	<u>Weighted Cost Rate</u>
Long-Term Debt	47.09%	5.73%	2.70%
Common Equity	<u>52.91%</u>	10.20-10.70%	<u>5.40%-5.66%</u>
Total	<u>100.00%</u>		<u>8.10%-8.36%</u>

III. SUMMARY

Q. Please summarize your recommended range of common equity cost rates.

A. My recommended range of common equity cost rates is between 10.20% and 10.70%, and is summarized on page 2 of Schedule DWD-1. I have assessed the market-based common

1 equity cost rates of companies of relatively similar, but not necessarily identical, risk to
2 BGWC. Using companies of relatively comparable risk as proxies is consistent with the
3 principles of fair rate of return established in the *Hope*¹ and *Bluefield*² cases. No proxy
4 group can be identical in risk to any single company, so there must be an evaluation of
5 relative risk between the company and the proxy group to see if it is appropriate to make
6 adjustments to the proxy group's indicated rate of return.

7 My recommendation results from the application of several cost of common equity
8 models, specifically the Discounted Cash Flow ("DCF") model, the Risk Premium Model
9 ("RPM"), and the Capital Asset Pricing Model ("CAPM"), to the market data of a proxy
10 group of six water companies ("Utility Proxy Group") whose selection criteria will be
11 discussed below. In addition, I also applied the DCF, RPM, and CAPM to a proxy group
12 of domestic, non-price regulated companies comparable in total risk to the six water
13 companies ("Non-Price Regulated Proxy Group").

14 The results derived from each are as follows:

¹ *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591 (1944).

² *Bluefield Water Works Improvement Co. v. Public Serv. Comm'n*, 262 U.S. 679 (1922).

Table 2: Summary of Common Equity Cost Rate

	Utility Proxy Group
Discounted Cash Flow Model	9.03%
Risk Premium Model	10.39
Capital Asset Pricing Model	9.91
Cost of Equity Models Applied to Comparable Risk, Non-Price Regulated Companies	<u>11.57</u>
Indicated Common Equity Cost Rate Before Adjustment	10.20%
Business Risk Adjustment	<u>0.50</u>
Recommended Common Equity Cost Rate After Adjustment	<u>10.70%</u>
Recommended Range of Common Equity Cost Rates	<u>10.20-10.70%</u>

After analyzing the indicated common equity cost rates derived through these models, I conclude that a common equity cost rate of 10.20% for the Company is indicated before any Company-specific adjustments. The indicated common equity cost rate was then adjusted upward by 0.50% to reflect BGWC's higher relative business risk as compared with the members of the Utility Proxy Group, resulting in a business risk-adjusted indicated common equity cost rate of 10.70%. The unadjusted common equity cost rate based on the Utility Proxy Group of 10.20% and the business risk adjusted common equity cost rate of 10.70% applicable to BGWC form the basis of my recommended range of common equity cost rates between 10.20% and 10.70%.

1 **IV. GENERAL PRINCIPLES**

2 **Q. What general principles have you considered in arriving at your recommended range**
3 **of common equity cost rates between 10.20% and 10.70%?**

4 A. In unregulated industries, the competition of the marketplace is the principal determinant
5 of the price of products or services. For regulated public utilities, regulation must act as a
6 substitute for marketplace competition. Assuring that the utility can fulfill its obligations
7 to the public, while providing safe and reliable service at all times, requires a level of
8 earnings sufficient to maintain the integrity of presently invested capital. Sufficient
9 earnings also permit the attraction of needed new capital at a reasonable cost, for which the
10 utility must compete with other firms of comparable risk, consistent with the fair rate of
11 return standards established by the U.S. Supreme Court in the previously cited *Hope* and
12 *Bluefield* decisions. Consequently, marketplace data must be relied on in assessing a
13 common equity cost rate appropriate for ratemaking purposes. Just as the use of the market
14 data for the proxy group adds reliability to the informed expert's judgment used in arriving
15 at a recommended common equity cost rate, the use of multiple generally accepted
16 common equity cost rate models also adds reliability and accuracy when arriving at a
17 recommended common equity cost rate.

18 **A. Business Risk**

19 **Q. Please define business risk and explain why it is important to the determination of a**
20 **fair rate of return.**

21 A. Business risk is the riskiness of a company's common stock without the use of debt and/or
22 preferred capital. Examples of such general business risks faced by all utilities (*i.e.*,
23 electric, natural gas distribution, and water) include size, the quality of management, the

1 regulatory environment in which utilities operate, customer mix and concentration of
2 customers, service territory growth, and capital intensity. All of these have a direct bearing
3 on earnings.

4 Consistent with the basic financial principle of risk and return, business risk is
5 important to the determination of a fair rate of return, because the higher the level of risk,
6 the higher the rate of return investors demand.

7 **Q. What business risks do the water and wastewater industries face in general?**

8 A. Water and wastewater utilities have an ever-increasing responsibility to be stewards of the
9 environment from which water supplies are drawn in order to preserve and protect essential
10 natural resources of the United States. This increased environmental stewardship is a direct
11 result of compliance with the Safe Water Drinking Act and response to continuous
12 monitoring by the Environmental Protection Agency (“EPA”) as well as state and local
13 governments of the water supply for potential contaminants and their resultant regulations.
14 This, plus aging infrastructure, necessitate additional capital investment in the distribution
15 and treatment of water, exacerbating the pressure on free cash flows arising from increased
16 capital expenditures for infrastructure repair and replacement. The significant amount of
17 capital investment and, hence, high capital intensity, is a major risk factor for the water and
18 wastewater utility industry.

19 *Value Line Investment Survey* (“*Value Line*”) observes the following about the
20 water utility industry:

21 In any case, just about every water company is involved in a
22 substantial construction program. For decades, investment in
23 upgrading older assets here was insufficient. Hence, just about all
24 members of this segment are now playing catchup. Fortunately,
25 regulators realize that water customers’ bills were too low (relative

1 to other utilities) to cover all of the rebuilding costs. The
2 relationship between regulators and water companies has been, for
3 the most part, very constructive. This has resulted in more funds
4 being used for capital projects. Indeed, replacing all of these aging
5 pipelines may cost more than \$1 trillion dollars over the next 25
6 years. According to the American Society of Civil Engineers, most
7 of the pipe laid in the U.S. was done so in the early to mid-20th
8 century. That would make most pipes being between 75 and 100
9 years old.

10 Consolidation is another major trend that is underway. Large
11 utilities, such as *American Water Works*, have been very active on
12 the acquisition front. Since many utilities are small, their operations
13 are very inefficient. They also lack the capital required to fund
14 construction programs to upgrade and modernize their existing
15 pipelines and wastewater facilities. So far, mergers have worked
16 out well for both parties. The bigger company can eliminate a large
17 amount of redundancies and reduce costs significantly. This
18 increases the size of their rate bases, which is what regulators allow
19 them to earn a return on. The end result is that small water districts
20 are seeing more investment and the level of service has improved.
21 At the same time, thanks to fair regulatory treatment, water utilities
22 are able to be profitable.³ (emphasis in original)

23 The water and wastewater industry also experience low depreciation rates.
24 Depreciation rates are one of the principal sources of internal cash flows for all utilities
25 (through a utility's depreciation expense), and are vital for a company to fund ongoing
26 replacements and repairs of water and wastewater systems. Water / wastewater utility
27 assets have long lives, and therefore have long capital recovery periods. As such, they face
28 greater risk due to inflation, which results in a higher replacement cost per dollar of net
29 plant.

30 Substantial capital expenditures, as noted by *Value Line*, will require significant
31 financing. The three sources of financing typically used are debt, equity (common and

³ *Value Line Investment Survey*, July 12, 2019.

1 preferred), and cash flow. All three are intricately linked to the opportunity to earn a
 2 sufficient rate of return as well as the ability to achieve that return. Consistent with *Hope*
 3 and *Bluefield*, the return must be sufficient to maintain credit quality as well as enable the
 4 attraction of necessary new capital, be it debt or equity capital.

5 **Q. What happens if the utility is unable to attract sufficient capital?**

6 A. If unable to raise debt or equity capital, the utility must turn to either retained earnings or
 7 free cash flow,⁴ both of which are directly linked to earning a sufficient rate of return. The
 8 level of free cash flow represents a utility's ability to meet the needs of its debt and equity
 9 holders. If either retained earnings or free cash flow is inadequate, it will be nearly
 10 impossible for the utility to attract the needed capital for new infrastructure investment
 11 necessary to ensure quality service to its customers. An insufficient rate of return can be
 12 financially devastating for utilities as well as a public safety issue for their customers.

13 Depriving a utility of the opportunity to receive adequate earnings will impair its
 14 ability to attract and secure capital, which can further impair the ability of the utility to
 15 perform necessary maintenance, invest in aging infrastructure, and ultimately to provide
 16 safe and reliable service at least cost. Such a scenario can lead to divestment or withdrawal
 17 from the sector in a particular jurisdiction, or even bankruptcy, the results of which would
 18 be dramatic for customers, who depend upon ongoing reliable service. Bonbright,
 19 Danielsens, and Kamerschen state:

20 A company that cannot meet its costs of capital, including its fixed charges
 21 and reasonable dividend requirements, cannot long continue to supply
 22 adequate public utility service to a growing community – not, at least,
 23 without violating expressed or implied commitments that it has already
 24 made in order to secure capital for the construction of its existing plant. In
 25 an extreme case, to be sure, failure to cover existing costs of capital could

⁴ Free Cash Flow = Operating Cash Flow (Funds From Operations) minus Capital Expenditures.

1 be ultimately resolved by a drastic financial reorganization, but not without
2 considerable cost and pain.⁵

3 The water and wastewater utility industry's high degree of capital intensity and low
4 depreciation rates, coupled with the need for substantial infrastructure capital spending,
5 require regulatory support in the form of adequate and timely rate relief, particularly a
6 sufficient authorized return on common equity, so that the industry can successfully meet
7 the challenges it faces.

8 **B. Financial Risk**

9 **Q. Please define financial risk and explain why it is important to the determination of a**
10 **fair rate of return.**

11 A. Financial risk is the additional risk created by the introduction of debt and preferred stock
12 into the capital structure. The higher the proportion of debt and preferred stock in the
13 capital structure, the higher the financial risk (*i.e.* likelihood of default). Therefore,
14 consistent with the basic financial principle of risk and return, investors demand a higher
15 common equity return as compensation for bearing higher default risk.

16 **Q. Can bond and credit ratings be a proxy for the combined business and financial risk**
17 **(*i.e.*, investment risk of an enterprise)?**

18 A. Yes, similar bond ratings/issuer credit ratings reflect, and are representative of, similar
19 combined business and financial risks (*i.e.*, total risk) faced by bond investors.⁶ Although
20 specific business or financial risks may differ between companies, the same bond/credit

⁵ Bonbright, James C., Danielsen, Albert, L., and Kamershen, David R., Principles of Public Utility Rates, 2nd Edition, 1988, at 306.

⁶ Risk distinctions within S&P's bond rating categories are recognized by a plus or minus, *i.e.*, within the A category, an S&P rating can be at A+, A, or A-. Similarly, risk distinctions for Moody's ratings are distinguished by numerical rating gradations, *i.e.*, within the A category, a Moody's rating can be A1, A2 and A3.

1 rating indicates that the combined risks are roughly similar, albeit not necessarily equal, as
2 the purpose of the bond/credit rating process is to assess credit quality or credit risk and
3 not common equity risk.

4 **Q. That being said, do rating agencies reflect company size in their bond ratings?**

5 A. No. Neither S&P nor Moody's have minimum company size requirements for any given
6 rating level. This means, all else equal, a relative size analysis needs to be conducted for
7 companies with similar bond ratings.

8 **V. CAPITAL STRUCTURE**

9 **Q. What capital structure ratios do you recommend be employed in developing an**
10 **overall fair rate of return appropriate for the Company?**

11 A. I recommend the use of a ratemaking capital structure consisting of 47.09% long-term debt
12 and 52.91% common equity as shown on page 1 of Schedule DWD-1. This capital
13 structure is based on a test year capital structure for BGWC's parent company, Corix
14 Regulated Utilities, Inc. ("CRU"), ending June 30, 2019.

15 **Q. How does your proposed ratemaking common equity ratio of 52.91% for BGWC**
16 **compare with the total equity ratios maintained by the companies in your Utility**
17 **Proxy Group?**

18 A. My proposed ratemaking common equity ratio of 52.91% for BGWC is reasonable and
19 consistent with the range of common equity ratios maintained, on average, by the
20 companies in the Utility Proxy Group on which I base my recommended common equity
21 cost rate. As shown on page 2 of Schedule DWD-2, the common equity ratios of the Utility
22 Proxy Group range from 43.40% to 63.46%, with a midpoint of 53.43% and an average of

1 54.75% in 2018. The equity ratio, on average, maintained by the Utility Proxy Group is
2 higher than the equity ratio requested by the Company.

3 In my opinion, a capital structure consisting of 47.09% long-term debt and 52.91%
4 common equity is appropriate for ratemaking purposes for BGWC in the current
5 proceeding because it is comparable, but conservative, to the average capital structure
6 ratios (based on total permanent capital) maintained by the water companies in the Utility
7 Proxy Group on whose market data I base my recommended common equity cost rate.

8 **Q. What cost rate for long-term debt is most appropriate for use in a cost of capital**
9 **determination for BGWC?**

10 A. A long-term debt cost rate of 5.73% is reasonable and appropriate as it is based on a test
11 year of CRU's long-term debt outstanding ending June 30, 2019.

12 **VI. BGWC AND THE UTILITY PROXY GROUP**

13 **Q. Are you familiar with the operations of BGWC?**

14 A. Yes. BGWC has approximately 26,400 customers in 16 counties: Lexington, Richland,
15 Sumpter, Aiken, Saluda, Orangeburg, Greenwood, and Williamsburg. The Company
16 operates 105 water systems and 28 sewer systems. BGWC is an operating subsidiary of
17 CRU, which is a wholly-owned subsidiary of Corix Infrastructure, Inc ("CII"). BGWC's
18 common stock is not publicly-traded.

19 **Q. Please explain how you chose your proxy group of six water companies.**

20 A. The basis of selection for the Utility Proxy Group was to select those companies which
21 meet the following criteria:

- 1 (i) They are included in the Water Utility Group of *Value Line's Standard or Small*
2 *and Midcap Editions* (July 12, 2019);
- 3 (ii) They have 70% or greater of 2018 total operating income and 70% or greater of
4 2018 total assets attributable to regulated water operations;
- 5 (iii) At the time of preparation of this testimony, they had not publicly announced that
6 they were involved in any major merger or acquisition activity (*i.e.*, one publicly
7 traded utility merging with or acquiring another);
- 8 (iv) They have not cut or omitted their common dividends during the five years ending
9 2018 or through the time of the preparation of this testimony;
- 10 (v) They have *Value Line* and Bloomberg adjusted betas;
- 11 (vi) They have a positive *Value Line* five-year dividends per share ("DPS") growth rate
12 projection; and
- 13 (vii) They have *Value Line*, Reuters, Zacks, or Yahoo! Finance consensus five-year
14 earnings per share ("EPS") growth rate projections.

15 The following six companies met these criteria: American States Water Co.,
16 American Water Works Co., Inc., Artesian Resources, Inc., California Water Service
17 Group, Middlesex Water Co., and York Water Co.

18 **Q. Please describe schedule DWD-2, page 1.**

19 A. Page 1 of Schedule DWD-2 contains comparative capitalization and financial statistics for
20 the six water companies identified above for the years 2014 to 2018.

21 During the five-year period ending 2018, the historically achieved average earnings
22 rate on book common equity for the group averaged 10.17%. The average common equity

1 ratio based on total permanent capital (excluding short-term debt) was 55.57%, and the
2 average dividend payout ratio was 60.28%.

3 Total debt to earnings before interest, taxes, depreciation, and amortization
4 (“EBITDA”) for the years 2014 to 2018 ranges between 3.42 and 3.98, with an average of
5 3.56. Funds from operations to total debt range from 23.84% to 26.23%, with an average
6 of 25.11%.

7 **VII. COMMON EQUITY COST RATE MODELS**

8 **Q. Are your cost of common equity models market-based models?**

9 A. Yes. The DCF model is market-based because market prices are used in developing the
10 dividend yield component of the model. The RPM is market-based because the bond
11 ratings and expected bond yields used in the application of the RPM reflect the market’s
12 assessment of bond/credit risk. In addition, the use of beta coefficients (β) to determine
13 the equity risk premium reflects the market’s assessment of market/systematic risk, since
14 beta coefficients are derived from regression analyses of market prices. The Predictive
15 Risk Premium Model (“PRPM”) uses monthly market returns in addition to expectations
16 of the risk-free rate. The CAPM is market-based for many of the same reasons that the
17 RPM is market-based (*i.e.*, the use of expected bond yields and beta coefficients).
18 Selection of the comparable risk non-price regulated companies is market-based because
19 it is based on statistics which result from regression analyses of market prices and reflect
20 the market’s assessment of total risk.

1 **A. Discounted Cash Flow Model**

2 **Q. What is the theoretical basis of the DCF model?**

3 A. The theory underlying the DCF model is that the present value of an expected future stream
4 of net cash flows during the investment holding period can be determined by discounting
5 those cash flows at the cost of capital, or the investors' capitalization rate. DCF theory
6 indicates that an investor buys a stock for an expected total return rate, which is derived
7 from cash flows received in the form of dividends plus appreciation in market price (the
8 expected growth rate). Mathematically, the dividend yield on market price plus a growth
9 rate equals the capitalization rate, *i.e.*, the total common equity return rate expected by
10 investors.

11 **Q. Which version of the DCF model do you use?**

12 A. I use the single-stage constant growth DCF model.

13 **Q. Please describe the dividend yield you used in your application of the DCF model.**

14 A. The unadjusted dividend yields are based on the proxy companies' dividends as of July 31,
15 2019, divided by the average of closing market prices for the 60 trading days ending July
16 31, 2019.⁷

17 **Q. Please explain your adjustment to the dividend yield.**

18 A. Because dividends are paid periodically (quarterly), as opposed to continuously (daily), an
19 adjustment must be made to the dividend yield. This is often referred to as the discrete, or
20 the Gordon Periodic, version of the DCF model.

⁷ See Schedule DWD-3, page 1, Column 1.

DCF theory calls for the use of the full growth rate, or D_1 , in calculating the dividend yield component of the model. Since the various companies in the Utility Proxy Group increase their quarterly dividend at various times during the year, a reasonable assumption is to reflect one-half the annual dividend growth rate in the dividend yield component, or $D_{1/2}$. Because the dividend should be representative of the next twelve-month period, my adjustment is a conservative approach that does not overstate the dividend yield. Therefore, the actual average dividend yields in Column 1 on page 1 of Schedule DWD-3 have been adjusted upward to reflect one-half the average projected growth rate shown in Column 6.

Q. Please explain the basis of the growth rates you apply to the Utility Proxy Group in your DCF model.

A. Investors with more limited resources than institutional investors are likely to rely on widely available financial information services, such as *Value Line*, Reuters, Zacks, and Yahoo! Finance. Investors realize that analysts have significant insight into the dynamics of the industries and individual companies they analyze, as well as companies' abilities to effectively manage the effects of changing laws and regulations, and ever-changing economic and market conditions. For these reasons, I use analysts' five-year forecasts of EPS growth in my DCF analysis.

Over the long run, there can be no growth in DPS without growth in EPS. Security analysts' earnings expectations have a more significant influence on market prices than dividend expectations. Thus, the use of earnings growth rates in a DCF analysis provides a better match between investors' market price appreciation expectations and the growth rate component of the DCF.

1 **Q. Please summarize the DCF model results.**

2 A. As shown on page 1 of Schedule DWD-3, the mean result of the application of the single-
3 stage DCF model is 8.93%, the median result is 9.13%, and the average of the two is 9.03%
4 for the Utility Proxy Group. In arriving at a conclusion for the DCF-indicated common
5 equity cost rate for the Utility Proxy Group, I have relied on an average of the mean and
6 the median results of the DCF. This approach takes into consideration all the proxy
7 companies' results, while mitigating the high and low outliers of those individual results.

8 **B. The Risk Premium Model**

9 **Q. Please describe the theoretical basis of the RPM.**

10 A. The RPM is based on the fundamental financial principle of risk and return, namely, that
11 investors require greater returns for bearing greater risk. The RPM recognizes that
12 common equity capital has greater investment risk than debt capital, as common equity
13 shareholders are behind debt holders in any claim on a company's assets and earnings. As
14 a result, investors require higher returns from common stocks than from investment in
15 bonds, to compensate them for bearing the additional risk.

16 While it is possible to directly observe bond returns and yields, investor required
17 common equity return cannot be directly determined or observed. According to RPM
18 theory, one can estimate a common equity risk premium over bonds (either historically or
19 prospectively), and use that premium to derive a cost rate of common equity. The cost of
20 common equity equals the expected cost rate for long-term debt capital plus a risk premium
21 over that cost rate to compensate common shareholders for the added risk of being
22 unsecured and last-in-line for any claim on the corporation's assets and earnings in the
23 event of a liquidation.

1 **Q. Please explain how you derived your indicated cost of common equity based on the**
2 **RPM.**

3 A. I relied on the results of the application of two risk premium methods. The first method is
4 the PRPM, while the second method is a risk premium model using a total market approach.

5 **Q. Please explain the PRPM.**

6 A. The PRPM, published in the *Journal of Regulatory Economics*,⁸ was developed from the
7 work of Robert F. Engle, who shared the Nobel Prize in Economics in 2003 “for methods
8 of analyzing economic time series with time-varying volatility (“ARCH”).⁹ Engle found
9 that volatility changes over time and is related from one period to the next, especially in
10 financial markets. Engle discovered that the volatility in prices and returns clusters over
11 time and is therefore highly predictable and can be used to predict future levels of risk and
12 risk premiums.

13 The PRPM estimates the risk / return relationship directly, as the predicted equity
14 risk premium is generated by the prediction of volatility or risk. The PRPM is not based
15 on an estimate of investor behavior, but rather on the evaluation of the results of that
16 behavior (*i.e.*, the variance of historical equity risk premiums).

17 The inputs to the model are the historical returns on the common shares of each
18 company in the Utility Proxy Group minus the historical monthly yield on long-term U.S.
19 Treasury securities through July 2019. Using a generalized form of ARCH, known as
20 GARCH, I calculated each Utility Proxy Group company’s projected equity risk premium

⁸ Autoregressive conditional heteroscedasticity. See “A New Approach for Estimating the Equity Risk Premium for Public Utilities”, Pauline M. Ahern, Frank J. Hanley and Richard A. Michelfelder, Ph.D. The Journal of Regulatory Economics (December 2011), 40:261-278.

⁹ The Nobel Prize, *The Sveriges Riksbank Prize in Economic Sciences in Memory of Alfred Nobel 2003*, Oct. 3, 2003, available at <https://www.nobelprize.org/prizes/economic-sciences/2003/press-release>.

1 using EvIEWS[®] statistical software. When the GARCH Model is applied to the historical
 2 return data, it produces a predicted GARCH variance series¹⁰ and a GARCH coefficient¹¹.
 3 Multiplying the predicted monthly variance by the GARCH coefficient, then annualizing
 4 it¹² produces the predicted annual equity risk premium. I then added the forecasted 30-
 5 year U.S. Treasury Bond yield, 2.91%¹³, to each company's PRPM-derived equity risk
 6 premium to arrive at an indicated cost of common equity. The 30-year Treasury yield is a
 7 consensus forecast derived from the *Blue Chip Financial Forecasts ("Blue Chip")*¹⁴. The
 8 mean PRPM indicated common equity cost rate for the Utility Proxy Group is 11.02%, the
 9 median is 10.91%, and the average of the two is 10.97%. Consistent with my reliance on
 10 the average of the median and mean results of the DCF, I will rely on the average of the
 11 mean and median results of the Utility Proxy Group PRPM to calculate a cost of common
 12 equity rate of 10.97%.

13 **Q. Please explain the total market approach RPM.**

14 A. The total market approach RPM adds a prospective public utility bond yield to an average
 15 of 1) an equity risk premium that is derived from a beta-adjusted total market equity risk
 16 premium, and 2) an equity risk premium based on the S&P Utilities Index.

¹⁰ Illustrated on Columns 1 and 2 of page 2 of Schedule DWD-4. In this instance, I have selected the lower predicted variance in order to be conservative.

¹¹ Illustrated on Column 4 of page 2 of Schedule DWD-4.

¹² Annualized Return = (1+Monthly Return)¹² - 1.

¹³ See Column 6 of page 2 of Schedule DWD-4.

¹⁴ *Blue Chip Financial Forecasts*, June 1, 2019 at p. 14 and August 1, 2019 at p. 2.

1 **Q. Please explain the basis of the expected bond yield of 4.35% applicable to the Utility**
 2 **Proxy Group.**

3 A. The first step in the total market approach RPM analysis is to determine the expected bond
 4 yield. Because both ratemaking and the cost of capital, including common equity cost rate,
 5 are prospective in nature, a prospective yield on similarly rated long-term debt is essential.
 6 I rely on a consensus forecast of about 50 economists of the expected yield on Aaa-rated
 7 corporate bonds for the six calendar quarters ending with the third calendar quarter of 2020
 8 and the long-term projections for 2020 to 2024, and 2025 to 2029 from Blue Chip. As
 9 shown on line No. 1 of page 3 of Schedule DWD-4, the average expected yield on Moody's
 10 Aaa-rated corporate bonds is 3.90%. In order to derive an expected yield on A2 rated-
 11 public utility bonds, I make an upward adjustment of 0.37%, which represents a recent
 12 spread between Aaa corporate bonds and A2-rated public utility bonds, in order to adjust
 13 the expected Aaa corporate bond yield to an equivalent Moody's A2-rated public utility
 14 bond.¹⁵ Adding that recent 0.37% spread to the expected Aaa corporate bond yield of
 15 3.90% results in an expected A2 public utility bond of 4.27%.

16 Since the Utility Proxy Group's average Moody's long-term issuer rating is A2/A3,
 17 another adjustment to the expected A2 public utility bond yield is needed to reflect the
 18 difference in bond ratings. An upward adjustment of 0.08%, which represents one-sixth of
 19 a recent spread between A2 and A3 public utility bond yields, is necessary to make the A2
 20 prospective bond yield applicable to an A2/A3 public utility bond.¹⁶ Adding the 0.08% to

¹⁵ As shown on Line No. 2 and explained in Note 2 of page 3 of Schedule DWD-4.

¹⁶ As shown on Line No. 4 and explained in Note 3 on page 3 of Schedule DWD-4.

the 4.27% prospective A2 public utility bond yield results in a 4.35% expected bond yield for the Utility Proxy Group.

Q. Please explain how the beta-derived equity risk premium is determined.

A. The components of the beta-derived risk premium model are 1) an expected market equity risk premium over corporate bonds, and 2) the beta coefficient. The derivation of the beta-derived equity risk premium that I apply to the Utility Proxy Group is shown on lines 1 through 9 of page 8 of Schedule DWD-4. The total beta-derived equity risk premium I apply is based on an average of: 1) Ibbotson-based equity risk premiums; 2) *Value Line*-based equity risk premiums; and a 3) Bloomberg-based equity risk premium. Each of these is described in turn.

Q. How did you derive a market equity risk premium based on long-term historical data?

A. To derive a historical market equity risk premium, I used the most recent holding period returns for the large company common stocks from the Stocks, Bonds, Bills, and Inflation (“SBBI”) 2019 Yearbook (“SBBI – 2019”)¹⁷ less the average historical yield on Moody’s Aaa/Aa-rated corporate bonds for the period 1928 to 2018. The use of holding period returns over a very long period of time is appropriate because it is consistent with the long-term investment horizon presumed by investing in a going concern, *i.e.*, a company expected to operate in perpetuity.

SBBI’s long-term arithmetic mean monthly total return rate on large company common stocks was 11.62% and the long-term arithmetic mean monthly yield on Moody’s

¹⁷ SBBI Appendix A Tables: Morningstar Stocks, Bonds, Bills, & Inflation 1926-2018.

1 Aaa/Aa-rated corporate bonds was 6.08%.¹⁸ As shown on line 1 of page 8 of Schedule
 2 DWD-4, subtracting the mean monthly bond yield from the total return on large company
 3 stocks results in a long-term historical equity risk premium of 5.54%.

4 I used the arithmetic mean monthly total return rates for the large company stocks
 5 and yields (income returns) for the Moody's Aaa/Aa corporate bonds, because they are
 6 appropriate for the purpose of estimating the cost of capital as noted in SBBI – 2019.¹⁹ The
 7 use of the arithmetic mean return rates and yields is appropriate because historical total
 8 returns and equity risk premiums provide insight into the variance and standard deviation
 9 of returns needed by investors in estimating future risk when making a current investment.
 10 If investors relied on the geometric mean of historical equity risk premiums, they would
 11 have no insight into the potential variance of future returns because the geometric mean
 12 relates the change over many periods to a constant rate of change, thereby obviating the
 13 year-to-year fluctuations, or variance, which is critical to risk analysis.

14 **Q. Please explain the derivation of the regression-based market equity risk premium.**

15 A. To derive the regression analysis-derived market equity risk premium of 8.35%, shown on
 16 line 2 of page 8 of Schedule DWD-4, I used the same monthly annualized total returns on
 17 large company common stocks relative to the monthly annualized yields on Moody's
 18 Aaa/Aa corporate bonds as mentioned above. The relationship between interest rates and
 19 the market equity risk premium was modeled using the observed monthly market equity
 20 risk premium as the dependent variable, and the monthly yield on Moody's Aaa/Aa
 21 corporate bonds as the independent variable. I used a linear Ordinary Least Squares

¹⁸ As explained in Note 1 on page 9 of Schedule DWD-4.

¹⁹ SBBI – 2019, at 10-22.

(“OLS”) regression, in which the market equity risk premium is expressed as a function of the Moody’s Aaa/Aa corporate bonds yield:

$$RP = \alpha + \beta (R_{Aaa/Aa})$$

Q. Please explain the derivation of a PRPM equity risk premium.

A. I used the same PRPM approach described previously to develop another equity risk premium estimate. The inputs to the model are the historical monthly returns on large company common stocks minus the monthly yields on Aaa/Aa corporate bonds during the period from January 1928 through July 2019.²⁰ Using the previously discussed generalized form of ARCH, known as GARCH, the projected equity risk premium is determined using Eviews[®] statistical software. The resulting PRPM predicted market equity risk premium is 9.05%.²¹

Q. Please explain the derivation of a projected equity risk premium based on *Value Line* data for your RPM analysis.

A. As noted previously, because both ratemaking and the cost of capital are prospective, a prospective market equity risk premium is needed. The derivation of the forecasted or prospective market equity risk premium can be found in Note 4 on page 8 of Schedule DWD-4. Consistent with my calculation of the dividend yield component in my DCF analysis, this prospective market equity risk premium is derived from an average of the three- to five-year median market price appreciation potential by *Value Line* for the thirteen

²⁰ Data from January 1926-December 2018 is from SBBI – 2019. Data from January – July 2019 is from Bloomberg Professional Services.

²¹ Shown on Line No. 3 on page 8 of Schedule DWD-4.

1 weeks ending August 2, 2019, plus an average of the median estimated dividend yield for
2 the common stocks of the 1,700 firms covered in *Value Line*'s Standard Edition.²²

3 The average median expected price appreciation is 54%, which translates to an
4 11.40% annual appreciation, and, when added to the average of *Value Line*'s median
5 expected dividend yields of 2.23%, equates to a forecasted annual total return rate on the
6 market of 13.63%. The forecasted Aaa bond yield of 3.90% is deducted from the total
7 market return of 13.63%, resulting in an equity risk premium of 9.73%, shown on page 8,
8 line 4 of Schedule DWD-4.

9 **Q. Please explain the derivation of an equity risk premium based on the S&P 500**
10 **companies.**

11 A. Using data from *Value Line*, I calculate an expected total return on the S&P 500 using
12 expected dividend yields and long-term growth estimates as a proxy for capital
13 appreciation. The expected total return for the S&P 500 is 14.52%. Subtracting the
14 prospective yield on Aaa Corporate bonds of 3.90% results in an 10.62% projected equity
15 risk premium.

16 **Q. Please explain the derivation of an equity risk premium based on Bloomberg data.**

17 A. Using data from Bloomberg Professional Services, I calculate an expected total return on
18 the S&P 500 using expected dividend yields and long-term growth estimates as a proxy for
19 capital appreciation, identical to the method described above. The expected total return for
20 the S&P 500 is 14.38%. Subtracting the prospective yield on Aaa Corporate bonds of
21 3.90% results in a 10.48% projected equity risk premium.

²² As explained in detail in page 2, Note 1 of Schedule DWD-5.

1 **Q. What is your conclusion of a beta-derived equity risk premium for use in your RPM**
 2 **analysis?**

3 A. I give equal weight to the six equity risk premiums in arriving at my conclusion of 8.96%.²³

4 After calculating the average market equity risk premium of 8.96%, I adjust it by
 5 beta to account for the risk of the Utility Proxy Group. As discussed below, the beta
 6 coefficient is a meaningful measure of prospective relative risk to the market as a whole
 7 and is a logical means by which to allocate a company's, or proxy group's, share of the
 8 market's total equity risk premium relative to corporate bond yields. As shown on page 1
 9 of Schedule DWD-5, the average of the mean and median beta coefficient for the Utility
 10 Proxy Group is 0.66. Multiplying the beta coefficient of the Utility Proxy Group of 0.66
 11 by the market equity risk premium of 8.96% results in a beta-adjusted equity risk premium
 12 of 5.91% for the Utility Proxy Group.

13 **Q. How did you derive the equity risk premium based on the S&P Utility Index and**
 14 **Moody's A-rated public utility bonds?**

15 A. I estimated three equity risk premiums based on S&P Utility Index holding returns, and
 16 two equity risk premiums based on the expected returns of the S&P Utilities Index, using
 17 *Value Line* and Bloomberg data, respectively. Turning first to the S&P Utility Index
 18 holding period returns, I derived a long-term monthly arithmetic mean equity risk premium
 19 between the S&P Utility Index total returns of 10.56% and monthly A-rated public utility
 20 bond yields of 6.56% from 1928 to 2018 to arrive at an equity risk premium of 4.00%.²⁴ I
 21 then used the same historical data to derive an equity risk premium of 6.04% based on a

²³ See Line No. 7 on page 8 of Schedule DWD-4.

²⁴ As shown on Line No. 1 on page 12 of Schedule DWD-4.

1 regression of the monthly equity risk premiums. The final S&P Utility Index holding
2 period equity risk premium involved applying the PRPM using the historical monthly
3 equity risk premiums from January 1928 to July 2019 to arrive at a PRPM-derived equity
4 risk premium of 3.77% for the S&P Utility Index.

5 I then derived expected total returns on the S&P Utilities Index of 10.51% and
6 9.10% using data from *Value Line* and Bloomberg Professional Services, respectively, and
7 subtracted the prospective A2-rated public utility bond yield (4.27%²⁵), which results in
8 risk premiums of 6.24% and 4.83%, respectively. As with the market equity risk
9 premiums, I averaged each risk premium to arrive at my utility-specific equity risk
10 premium of 4.98%.

11 **Q. What is your conclusion of an equity risk premium for use in your total market**
12 **approach RPM analysis?**

13 A. The equity risk premium I applied to the Utility Proxy Group is 5.45%, which is the average
14 of the beta-derived and the S&P utility equity risk premiums of 5.91% and 4.98%,
15 respectively.²⁶

16 **Q. What is the indicated RPM common equity cost rate based on the total market**
17 **approach?**

18 A. As shown on line No. 7 of Schedule DWD-4, page 3, I calculate a common equity cost rate
19 of 9.80% for the Utility Proxy Group based on the total market approach of the RPM.

²⁵ Derived on Line No. 3 of page 3 of Schedule DWD-4.

²⁶ As shown on page 7 of Schedule DWD-4.

1 **Q. What are the results of your application of the PRPM and the total market approach**
2 **RPM?**

3 A. As shown on page 1 of Schedule DWD-4, the indicated RPM-derived common equity cost
4 rate is 10.39%, which gives equal weight to the PRPM (10.97%) and the adjusted market
5 approach results (9.80%).

6 **C. The Capital Asset Pricing Model**

7 **Q. Please explain the theoretical basis of the CAPM.**

8 A. CAPM theory defines risk as the co-variability of a security's returns with the market's
9 returns as measured by the beta coefficient (β). A beta coefficient less than 1.0 indicates
10 lower variability than the market as a whole, while a beta coefficient greater than 1.0
11 indicates greater variability than the market.

12 The CAPM assumes that all other risk (*i.e.*, all non-market or unsystematic risk)
13 can be eliminated through diversification. The risk that cannot be eliminated through
14 diversification is called market, or systematic, risk. In addition, the CAPM presumes that
15 investors require compensation only for systematic risk, which is the result of
16 macroeconomic and other events that affect the returns on all assets. The model is applied
17 by adding a risk-free rate of return to a market risk premium, which is adjusted
18 proportionately to reflect the systematic risk of the individual security relative to the total
19 market as measured by the beta coefficient. The traditional CAPM model is expressed as:

$$1 \quad R_s = R_f + \beta(R_m - R_f)$$

2 Where: R_s = Return rate on the common stock

3 R_f = Risk-free rate of return

4 R_m = Return rate on the market as a whole

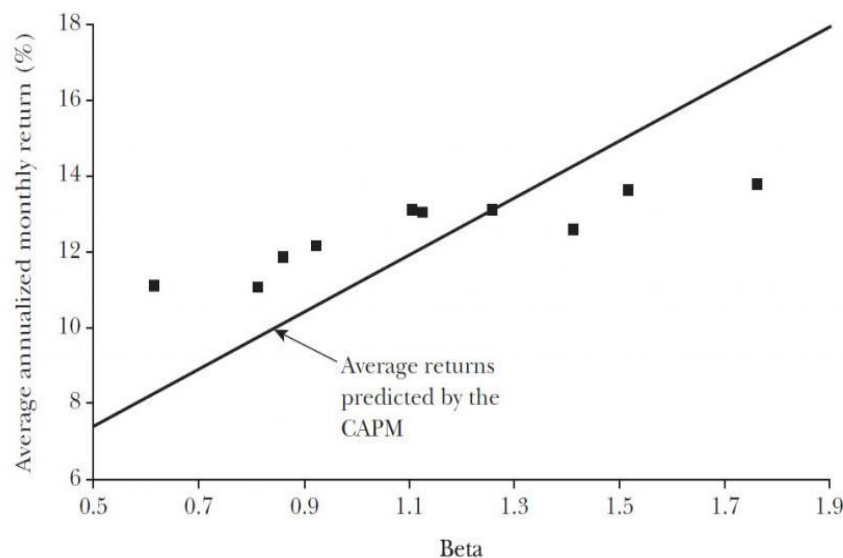
5 β = Adjusted beta coefficient (volatility of the
6 security relative to the market as a whole)

7 Numerous tests of the CAPM have measured the extent to which security returns
8 and beta coefficients are related as predicted by the CAPM, confirming its validity. The
9 empirical CAPM ("ECAPM") reflects the reality that while the results of these tests support
10 the notion that the beta coefficient is related to security returns, the empirical Security
11 Market Line ("SML") described by the CAPM formula is not as steeply sloped as the
12 predicted SML.²⁷ The ECAPM reflects this empirical reality. Fama and French clearly
13 state regarding Figure 2, below, that "[t]he returns on the low beta portfolios are too high,
14 and the returns on the high beta portfolios are too low."²⁸

²⁷ Roger A. Morin, New Regulatory Finance (Public Utility Reports, Inc., 2006), at p. 175.

²⁸ Eugene F. Fama and Kenneth R. French, "The Capital Asset Pricing Model: Theory and Evidence", *Journal of Economic Perspectives*, Vol. 18, No. 3, Summer 2004 at 33 "Fama & French".

Figure 2 <http://pubs.aeaweb.org/doi/pdfplus/10.1257/0895330042162430>
 Average Annualized Monthly Return versus Beta for Value Weight Portfolios
 Formed on Prior Beta, 1928–2003



In addition, Morin observes that while the results of these tests support the notion that beta is related to security returns, the empirical SML described by the CAPM formula is not as steeply sloped as the predicted SML. Morin states:

With few exceptions, the empirical studies agree that ... low-beta securities earn returns somewhat higher than the CAPM would predict, and high-beta securities earn less than predicted.²⁹

* * *

Therefore, the empirical evidence suggests that the expected return on a security is related to its risk by the following approximation:

$$K = R_F + x \beta(R_M - R_F) + (1-x) \beta(R_M - R_F)$$

where x is a fraction to be determined empirically. The value of x that best explains the observed relationship [is] $\text{Return} = 0.0829 + 0.0520 \beta$ is between 0.25 and 0.30. If x = 0.25, the equation becomes:

$$K = R_F + 0.25(R_M - R_F) + 0.75 \beta(R_M - R_F)^{30}$$

²⁹ Morin, at 175.

³⁰ Morin, at 190.

1 Fama and French provide similar support for the ECAPM when they state:

2 The early tests firmly reject the Sharpe-Lintner version of the CAPM. There
3 is a positive relation between beta and average return, but it is too 'flat.'...
4 The regressions consistently find that the intercept is greater than the
5 average risk-free rate... and the coefficient on beta is less than the average
6 excess market return... This is true in the early tests... as well as in more
7 recent cross-section regressions tests, like Fama and French (1992).³¹

8 Finally, Fama and French further note:

9 Confirming earlier evidence, the relation between beta and average return
10 for the ten portfolios is much flatter than the Sharpe-Linter CAPM predicts.
11 The returns on low beta portfolios are too high, and the returns on the high
12 beta portfolios are too low. For example, the predicted return on the
13 portfolio with the lowest beta is 8.3 percent per year; the actual return as
14 11.1 percent. The predicted return on the portfolio with the t beta is 16.8
15 percent per year; the actual is 13.7 percent.³²

16
17 Clearly, the justification from Morin, Fama, and French along with their reviews of
18 other academic research on the CAPM, validate the use of the ECAPM. In view of theory
19 and practical research, I have applied both the traditional CAPM and the ECAPM to the
20 companies in the Utility Proxy Group and averaged the results.

21 **Q. What beta coefficients did you use in your CAPM analysis?**

22 A. With respect to the beta coefficient, I considered two methods of calculation: the average
23 of the beta coefficients of the Utility Proxy Group companies reported by Bloomberg
24 Professional Services and the average of the beta coefficients of the Utility Proxy Group
25 companies as reported by *Value Line*. While both of those services adjust their calculated
26 (or "raw") beta coefficients to reflect the tendency of the beta coefficient to regress to the

³¹ Fama & French, at 32.

³² *Ibid.*, at 33.

1 market mean of 1.00, *Value Line* calculates the beta coefficient over a five-year period,
2 while Bloomberg's calculation is based on two years of data.

3 **Q. Please describe your selection of a risk-free rate of return.**

4 A. As shown in Column 5 on page 1 of Schedule DWD-5, the risk-free rate adopted for both
5 applications of the CAPM is 2.91%. This risk-free rate of 2.91% is based on the average
6 of the *Blue Chip* consensus forecast of the expected yields on 30-year U.S. Treasury bonds
7 for the six quarters ending with the fourth calendar quarter of 2020 and long-term
8 projections for the years 2021 to 2025 and 2026 to 2030.

9 **Q. Why is the yield on long-term U.S. Treasury Bonds appropriate for use as the risk-**
10 **free rate?**

11 A. The yield on long-term U.S. Treasury Bonds is almost risk-free and its term is consistent
12 with the long-term cost of capital to public utilities measured by the yields on A-rated
13 public utility bonds; the long-term investment horizon inherent in utilities' common stocks;
14 and the long-term life of the jurisdictional rate base to which the allowed fair rate of return
15 (*i.e.*, cost of capital) will be applied. In contrast, short-term U.S. Treasury yields are more
16 volatile and largely a function of Federal Reserve monetary policy.

17 **Q. Please explain the estimation of the expected risk premium for the market used in**
18 **your CAPM analyses.**

19 A. The basis of the market risk premium is explained in detail in Note 1 on Schedule DWD-5.
20 As discussed previously, the market risk premium is derived from an average of:

- 21 (i) Ibbotson-based market risk premiums;
22 (ii) *Value Line* data-based market risk premiums; and

1 (iii) Bloomberg data-based market risk premium.

2 The long-term income return on U.S. Government Securities of 5.12% was
3 deducted from the SBBI - 2019 monthly historical total market return of 11.89%, which
4 results in a historical market equity risk premium of 6.77%.³³ I applied a linear OLS
5 regression to the monthly annualized historical returns on the S&P 500 relative to historical
6 yields on long-term U.S. Government Securities from SBBI - 2019. That regression
7 analysis yielded a market equity risk premium of 9.42%. The PRPM market equity risk
8 premium is 10.20%, and is derived using the PRPM relative to the yields on long-term U.S.
9 Treasury securities from January 1926 through July 2019.

10 The *Value Line*-derived forecasted total market equity risk premium is derived by
11 deducting the forecasted risk-free rate of 2.91%, discussed above, from the *Value Line*
12 projected total annual market return of 13.63%, resulting in a forecasted total market equity
13 risk premium of 10.72%. The S&P 500 projected market equity risk premium using *Value*
14 *Line* data is derived by subtracting the projected risk-free rate of 2.91% from the projected
15 total return of the S&P 500 of 14.52%. The resulting market equity risk premium is
16 11.61%.

17 The S&P 500 projected market equity risk premium using Bloomberg data is
18 derived by subtracting the projected risk-free rate of 2.91% from the projected total return
19 of the S&P 500 of 14.38%. The resulting market equity risk premium is 11.47%.

20 These six market risk premiums, when averaged, result in an average total market
21 equity risk premium of 10.03%.

³³ SBBI – 2019, at Appendix A-1 (1) through .A-1 (3) and Appendix A-7 (19) through A-7 (21).

1 **Q. What are the results of your application of the traditional and empirical CAPM to**
2 **the Utility Proxy Group?**

3 A. As shown on page 1 of Schedule DWD-5, the mean result of my CAPM/ECAPM analyses
4 is 9.94%, the median is 9.87%, and the average of the two is 9.91%. Consistent with my
5 reliance on the average of mean and median DCF results discussed above, the indicated
6 common equity cost rate using the CAPM/ECAPM is 9.91%.

7 **D. Common Equity Cost Rates for a Proxy Group of Domestic, Non-Price**
8 **Regulated Companies Based on the DCF, RPM, and CAPM**

9 **Q. Why do you also consider a proxy group of domestic, non-price regulated companies?**

10 A. In the *Hope* and *Bluefield* cases, the U.S. Supreme Court did not specify that comparable
11 risk companies had to be utilities. Since the purpose of rate regulation is to be a substitute
12 for the competition of the marketplace, non-price regulated firms operating in the
13 competitive marketplace make an excellent proxy if they are comparable in total risk to the
14 Utility Proxy Group being used to estimate the cost of common equity. The selection of
15 such domestic, non-price-regulated competitive firms theoretically and empirically results
16 in a proxy group which is comparable in total risk to the Utility Proxy Group.

17 **Q. How did you select unregulated companies that are comparable in total risk to the**
18 **regulated public Utility Proxy Group?**

19 A. In order to select a proxy group of domestic, non-price regulated companies similar in total
20 risk to the Utility Proxy Group, I relied on the beta coefficients and related statistics derived
21 from *Value Line* regression analyses of weekly market prices over the most recent 260
22 weeks (*i.e.*, five years). Using these selection criteria resulted in a proxy group of eleven
23 domestic, non-price regulated firms comparable in total risk to the Utility Proxy Group.

1 Total risk is the sum of non-diversifiable market risk and diversifiable company-specific
2 risks. The criteria used in the selection of the domestic, non-price regulated firms was:

- 3 (i) They must be covered by *Value Line Investment Survey* (Standard Edition);
4 (ii) They must be domestic, non-price regulated companies, *i.e.*, non-utilities;
5 (iii) Their beta coefficients must lie within plus or minus two standard deviations of the
6 average unadjusted beta coefficient of the Utility Proxy Group; and
7 (iv) The residual standard errors of the *Value Line* regressions which gave rise to the
8 unadjusted beta coefficients must lie within plus or minus two standard deviations
9 of the average residual standard error of the Utility Proxy Group.

10 Beta coefficients are a measure of market, or systematic, risk, which is not
11 diversifiable. The residual standard errors of the regressions were used to measure each
12 firm's company-specific, diversifiable risk. Companies that have similar beta coefficients
13 and similar residual standard errors resulting from the same regression analyses have
14 similar total investment risk.

15 **Q. Have you prepared a schedule which shows the data from which you selected the**
16 **eleven domestic, non-price regulated companies that are comparable in total risk to**
17 **the Utility Proxy Group?**

18 A. Yes, the basis of my selection and both proxy groups' regression statistics are shown in
19 Schedule DWD-6.

1 **Q. Did you calculate common equity cost rates using the DCF, RPM, and CAPM for the**
2 **Non-Price Regulated Proxy Group?**

3 A. Yes. Because the DCF, RPM, and CAPM have been applied in an identical manner as
4 described above, I will not repeat the details of the rationale and application of each model.
5 One exception is in the application of the RPM, where I did not use public utility-specific
6 equity risk premiums, nor did I apply the PRPM to the individual companies.

7 Page 2 of Schedule DWD-7 contains the derivation of the DCF cost rates. As
8 shown, the indicated common equity cost rate using the DCF for the Non-Price Regulated
9 Proxy Group comparable in total risk to the Utility Proxy Group, is 12.14%.

10 Pages 3 through 5 contain the data and calculations that support the 11.60% RPM
11 cost rate. As shown on line No. 1 of page 3 of Schedule DWD-7, the consensus prospective
12 yield on Moody's Baa rated corporate bonds for the six quarters ending in the fourth quarter
13 of 2020, and for the years 2021 to 2025 and 2026 to 2030, is 4.90%.³⁴

14 When the beta-adjusted risk premium of 6.90%³⁵ relative to the Non-Price
15 Regulated Proxy Group is added to the prospective Baa2 rated corporate bond yield of
16 4.90%, the indicated RPM cost rate is 11.60%.

17 Page 6 contains the inputs and calculations that support my indicated
18 CAPM/ECAPM cost rate of 10.84%.

³⁴ *Blue Chip Financial Forecasts*, December 1, 2018, at p. 14 and August 1, 2019, at p. 2.

³⁵ Derived on page 5 of Schedule DWD-7.

1 **Q. How is the cost rate of common equity based on the Non-Price Regulated Proxy**
2 **Group comparable in total risk to the Utility Proxy Group?**

3 A. As shown on page 1 of Schedule DWD-7, the results of the DCF, RPM, and CAPM applied
4 to the Non-Price Regulated Proxy Group comparable in total risk to the Utility Proxy
5 Group are 12.14%, 11.60%, and 10.84%, respectively. The average of the mean and
6 median of these models is 11.57%, which I use as the indicated common equity cost rate
7 for the Non-Price Regulated Proxy Group.

8 **VIII. CONCLUSION OF COMMON EQUITY COST RATE BEFORE ADJUSTMENT**

9 **Q. What is the indicated common equity cost rate before adjustment?**

10 A. Based on the results of the application of multiple cost of common equity models to the
11 Utility Proxy Group and the Non-Price Regulated Proxy Group, the indicated cost of equity
12 before adjustment is 10.20%. I use multiple cost of common equity models as primary
13 tools in arriving at my recommended common equity cost rate, because no single model is
14 so inherently precise that it can be relied on solely to the exclusion of other theoretically
15 sound models. The use of multiple models adds reliability to the estimation of the common
16 equity cost rate, and the prudence of using multiple cost of common equity models is
17 supported in both the financial literature and regulatory precedent.

18 Based on these common equity cost rate results, I conclude that a common equity
19 cost rate of 10.20% is reasonable, appropriate and indicated for the Company before any
20 adjustment for relative risk between the Company and the Utility Proxy Group is made.
21 The 10.20% indicated ROE is the approximate average of the mean and median results
22 produced by my application of the models as explained above.

1 **IX. ADJUSTMENTS TO THE COMMON EQUITY COST RATE**

2 **A. Business Risk Adjustment**

3 **Q. Please summarize the unique business risk BGWC faces relative to the Utility Proxy**
 4 **Group.**

5 A. There are two types of business risk that should be considered by the Commission in
 6 determining the rate of return of common equity for BGWC; the current regulatory
 7 environment in South Carolina and BGWC's smaller size compared to the Utility Proxy
 8 Group.

9 **Q. Is there any precedent that identifies the regulatory risk faced by utilities?**

10 A. Yes. In *Hope*, the Supreme Court noted that it is not the theory, but the impact of the rate
 11 order which counts.³⁶ In *Duquesne*, the Supreme Court noted the risks to utilities of
 12 ratemaking treatment and the importance of establishing ratemaking treatment that does
 13 not continuously favor customers to the continuous detriment of investors:

14 [t]he risks a utility faces are in large part defined by the rate methodology
 15 because utilities are virtually always public monopolies dealing in essential
 16 service, and so relatively immune to the usual market risks. Consequently,
 17 a State's decision to arbitrarily switch back and forth between
 18 methodologies in a way which required investors to bear the risk of bad
 19 investments at some times while denying them the benefit of good
 20 investments at others would raise serious constitutional questions.³⁷

21 **Q. How does the regulatory environment in which a utility operates affect its access to**
 22 **and cost of capital?**

23 A. The regulatory environment can significantly affect a utility's access to capital and its cost
 24 of capital in several ways. First, the proportion and cost of debt capital available to utility

³⁶ *Hope*, 320 U.S., at 602, 64 S.Ct., at 288.

³⁷ *Duquesne*, 109 S.Ct. 609 (1989) at 9.

1 companies are influenced by the rating agencies' assessment of the regulatory environment.
 2 As noted by Moody's, "the predictability and supportiveness of the regulatory framework
 3 in which a regulated utility operates is a key credit consideration and the one that
 4 differentiates the industry from most other corporate sectors."³⁸ Moody's further noted
 5 that:

6 For a regulated utility company, we consider the characteristics of the
 7 regulatory environment in which it operates. These include how developed
 8 the regulatory framework is; its track record for predictability and stability
 9 in terms of decision making; and the strength of the regulator's authority
 10 over utility regulatory issues. A utility operating in a stable, reliable, and
 11 highly predictable regulatory environment will be scored higher on this
 12 factor than a utility operating in a regulatory environment that exhibits a
 13 high degree of uncertainty or unpredictability. Those utilities operating in a
 14 less developed regulatory framework or one that is characterized by a high
 15 degree of political intervention in the regulatory process will receive the
 16 lowest scores on this factor.³⁹

17 S&P also notes that regulatory commissions should eliminate, or at least greatly
 18 reduce, the issue of rate-case lag.⁴⁰ Moody's agrees that timely cost recovery is an
 19 important determinant of credit quality, stating that "[t]he ability to recover prudently
 20 incurred costs in a timely manner is perhaps the single most important credit consideration
 21 for regulated utilities, as the lack of timely recovery of such costs has caused financial
 22 stress for utilities on several occasions"⁴¹ Similarly, Fitch Ratings ("Fitch") notes that in
 23 the current environment of rising costs, utilities will require more frequent rate increases
 24 to maintain financial results, resulting in further exposure to regulatory risks.⁴²

³⁸ Moody's Global Infrastructure Finance, Regulated Electric and Gas Utilities, August 2009, at 6.

³⁹ *Ibid.*

⁴⁰ Standard and Poor's, Assessing Vertically Integrated Utilities' Business Risk Drivers, U.S. Utilities and Power Commentary, November 2006, at 10.

⁴¹ Moody's, Global Infrastructure Finance, Regulated Electric and Gas Utilities, August 2009, at 7.

⁴² FitchRatings, U.S. Utilities, Power, and Gas 2010 Outlook, December 4, 2009, at 1.

1 **Q. How is the South Carolina regulatory environment perceived by equity investors?**

2 A. Regulatory Research Associates (“RRA”)⁴³ rank South Carolina as Average/3 from an
3 investor viewpoint. Even though the South Carolina regulatory environment is seen to be
4 average by RRA, its rating has been downgraded twice in recent years; from Average/1 to
5 Average/2 on 10/3/2017 and Average/2 to Average/3 on 8/7/2018. The August 2018
6 downgrade was a result of a federal court’s denial of South Carolina Electric & Gas’s
7 request for a stay of the legislatively required \$367 million rate reduction. While this
8 uncertainty surrounding the regulatory climate in South Carolina is not specific to either
9 water utilities or to direct Commission action, the General Assembly’s interference in
10 Commission matters is concerning and should be accounted for in the investor-required
11 return.

12 **Q. Please explain why size has a bearing on business risk.**

13 A. Company size is a significant element of business risk for which investors expect to be
14 compensated through higher returns. Generally, smaller companies are less able to cope
15 with significant events that affect sales, revenues, and earnings. For example, smaller
16 companies face more risk exposure to business cycles and economic conditions, both
17 nationally and locally. Additionally, the loss of revenues from a few larger customers
18 would have a greater effect on a small company than on a much larger company with a
19 larger, more diverse, customer base.

20 Further evidence of the risk effects of size include the fact that investors demand
21 greater returns to compensate for the lack of marketability and liquidity of the securities of
22 smaller firms. For these reasons, the Commission should authorize a cost of common

⁴³ RRA Regulatory Focus, South Carolina Regulatory Review, November 13, 2019.

equity in this proceeding that reflects BGWC's relevant risk, including the impact of its small size.

Q. Is there a way to quantify a relative risk adjustment due to BGWC's increased business risk relative to the Utility Proxy Group?

A. Yes. The Company has greater relative risk than the average company in the Utility Proxy Group because of its greater business risk compared with the group as discussed above. As a proxy for business risk, I have used the Duff & Phelps size deciles from its 2019 Cost of Capital Navigator as measured by an estimated market capitalization of common equity for BGWC (whose common stock is not publicly-traded).

Table 5: Size as Measured by Market Capitalization for the Company and the Utility Proxy Group

	<u>Market Capitalization*</u> (\$ Millions)	<u>Times Greater than the Company</u>
BGWC	\$59.825	
Utility Proxy Group	\$4,663.072	20.2x

*From page 1 of Schedule DWD-8.

The Company's estimated market capitalization was at \$59.825 million as of July 31, 2019, compared with the market capitalization of the average water company in the Utility Proxy Group of \$4.663 billion as of July 31, 2019. The Utility Proxy Group's market capitalization is 77.9 times the size of BGWC's estimated market capitalization. As a result, it is necessary to upwardly adjust the indicated common equity cost rate of 10.20% to reflect BGWC's greater risk due to its smaller relative size. The determination is based on the size premiums for portfolios of New York Stock Exchange, American Stock Exchange, and NASDAQ listed companies ranked by deciles for the 1926 to 2018 period.

The average size premium for the Utility Proxy Group with a market capitalization of \$4.663 billion falls in the 4th decile, while BGWC's market capitalization of \$59.825 million places the Company in the 10th decile. The size premium spread between the 4th decile and the 10th decile is 4.37%. Even though a 4.37% upward size adjustment is indicated, I applied a business risk premium of 0.50% to BGWC's indicated common equity cost rate.

Q. Did you evaluate BGWC's parent, CRU's estimated market capitalization compared to the proxy group?

A. Yes. Even though I do not think it is applicable⁴⁴, I looked at CRU's common equity balance at June 30, 2019. I then adjusted it by the proxy group market-to-book ratio and compared it with the proxy group. CRU's estimated market capitalization, \$1.044 billion⁴⁵, would fall in the 8th decile, which would indicate a 0.95% size premium over the average proxy group company.

Q. Did you evaluate other measures of relative size between BGWC and the proxy group?

A. Yes. In order to present a more robust analysis, I compared BGWC and the Utility Proxy Group using various measures of size as described by Duff and Phelps' 2019 Valuation Yearbook. The measures are listed below:

⁴⁴ It is Mr. D'Ascendis' opinion that the parent company's size is irrelevant in setting rates for one of its jurisdictional subsidiaries. Regulation is required to look at each operating utility as a stand-alone company since they can only set rates for that particular utility and no other operating subsidiary outside of their jurisdiction.

⁴⁵ \$282.859M x 369.1% = \$1,044.033M

- Market Value of Common Equity
- Book Value of Common Equity
- Market Value of Invested Capital
- Total Assets
- Total Sales
- Number of Employees

As shown on page 3 of Schedule DWD-8, in all measures, BGWC was determined to be smaller than the average water proxy group company with associated size premiums ranging from 1.08% to 3.04%. In view of these results, in my opinion, an upward business risk adjustment of 0.50% to the indicated cost of common equity is both appropriate and conservative.

Q. What is the indicated cost of common equity after adjustment for business risk?

A. After applying the 0.50% business risk adjustment to the indicated cost of common equity of 10.20%, a business risk-adjusted cost of common equity of 10.70% results.

X. CONCLUSION OF COMMON EQUITY COST RATE

Q. What is your recommended range of common equity cost rates for BGWC?

A. Given the indicated cost of common equity based on the Utility Proxy Group of 10.20%, and the business risk-adjusted cost of common equity of 10.70%, I conclude that an acceptable range of cost of common equity for the Company is between 10.20% and 10.70%.

Q. In your opinion, is your proposed range of cost of common equity between 10.20% and 10.70% and the Company's requested cost of common equity of 10.70% fair and

1 **reasonable to BGWC, its shareholders, and its customers, considering the above**
2 **economic conditions?**

3 A. Yes, it is.

4 **Q. Does this conclude your direct testimony?**

5 A. Yes, it does.

Summary

Dylan is an experienced consultant and a Certified Rate of Return Analyst (CRRA) and Certified Valuation Analyst (CVA). He has served as a consultant for investor-owned and municipal utilities and authorities for 11 years. Dylan has extensive experience in rate of return analyses, class cost of service, rate design, and valuation for regulated public utilities. He has testified as an expert witness in the subjects of rate of return, cost of service, rate design, and valuation before 18 regulatory commissions in the U.S. and an American Arbitration Association panel.

He also maintains the benchmark index against which the Hennessy Gas Utility Mutual Fund performance is measured.

Areas of Specialization

- | | | |
|----------------------------|---|-------------------|
| ■ Regulation and Rates | ■ Capital Market Risk | ■ Rate of Return |
| ■ Utilities | ■ Financial Modeling | ■ Cost of Service |
| ■ Mutual Fund Benchmarking | ■ Valuation | ■ Rate Design |
| ■ Capital Market Risk | ■ Regulatory Strategy and Rate Case Support | |

Recent Expert Testimony Submission/Apearances

<i>Jurisdiction</i>	<i>Topic</i>
■ Illinois Commerce Commission	Cost of Service, Rate Design
■ New Jersey Board of Public Utilities	Cost of Service, Rate Design
■ Hawaii Public Utilities Commission	Cost of Service, Rate Design
■ South Carolina Public Service Commission	Return on Common Equity
■ American Arbitration Association	Valuation

Recent Assignments

- Provided expert testimony on the cost of capital for ratemaking purposes before numerous state utility regulatory agencies
- Maintains the benchmark index against which the Hennessy Gas Utility Mutual Fund performance is measured
- Sponsored valuation testimony for a large municipal water company in front of an American Arbitration Association Board to justify the reasonability of their lease payments to the City
- Co-authored a valuation report on behalf of a large investor-owned utility company in response to a new state regulation which allowed the appraised value of acquired assets into rate base

Recent Publications and Speeches

- Co-Author of: “Decoupling Impact and Public Utility Conservation Investment”, co-authored with Richard A. Michelfelder, Ph.D., Rutgers University and Pauline M. Ahern. Energy Policy Journal, 130 (2019), 311-319.
- “Establishing Alternative Proxy Groups”, before the Society of Utility and Regulatory Financial Analysts: 51st Financial Forum, April 4, 2019, New Orleans, LA.

- “Past is Prologue: Future Test Year”, Presentation before the National Association of Water Companies 2017 Southeast Water Infrastructure Summit, May 2, 2017, Savannah, GA.
- Co-author of: “Comparative Evaluation of the Predictive Risk Premium Model™, the Discounted Cash Flow Model and the Capital Asset Pricing Model”, co-authored with Richard A. Michelfelder, Ph.D., Rutgers University, Pauline M. Ahern, and Frank J. Hanley, The Electricity Journal, May, 2013.
- “Decoupling: Impact on the Risk and Cost of Common Equity of Public Utility Stocks”, before the Society of Utility and Regulatory Financial Analysts: 45th Financial Forum, April 17-18, 2013, Indianapolis, IN.

SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Regulatory Commission of Alaska				
Alaska Power Company	07/16	Alaska Power Company	Docket No. TA857-2	Rate of Return
Arizona Corporation Commission				
Arizona Water Company	08/18	Arizona Water Company	Docket No. W01445A-18-0164	Rate of Return
Colorado Public Utilities Commission				
Summit Utilities, Inc.	04/18	Colorado Natural Gas Company	Docket No. 18AL-0305G	Return on Equity
Atmos Energy Corporation	06/17	Atmos Energy Corporation	Docket No. 17AL-0429G	Return on Equity
Delaware Public Service Commission				
Tidewater Utilities, Inc.	11/13	Tidewater Utilities, Inc.	Docket No. 13-466	Capital Structure
Hawaii Public Utilities Commission				
Kaupulehu Water Company	02/18	Kaupulehu Water Company	Docket No. 2016-0363	Rate of Return
Aqua Engineers, LLC	05/17	Puhi Sewer & Water Company	Docket No. 2017-0118	Cost of Service / Rate Design
Hawaii Resources, Inc.	09/16	Laie Water Company	Docket No. 2016-0229	Cost of Service / Rate Design
Illinois Commerce Commission				
Utility Services of Illinois, Inc.	11/17	Utility Services of Illinois, Inc.	Docket No. 17-1106	Cost of Service / Rate Design
Aqua Illinois, Inc.	04/17	Aqua Illinois, Inc.	Docket No. 17-0259	Rate of Return
Utility Services of Illinois, Inc.	04/15	Utility Services of Illinois, Inc.	Docket No. 14-0741	Rate of Return
Indiana Utility Regulatory Commission				
Aqua Indiana, Inc.	03/16	Aqua Indiana, Inc. Aboite Wastewater Division	Docket No. 44752	Rate of Return
Twin Lakes, Utilities, Inc.	08/13	Twin Lakes, Utilities, Inc.	Docket No. 44388	Rate of Return
Kansas Corporation Commission				
Atmos Energy	07/19	Atmos Energy	19-ATMG-525-RTS	Rate of Return
Louisiana Public Service Commission				
Louisiana Water Service, Inc.	06/13	Louisiana Water Service, Inc.	Docket No. U-32848	Rate of Return
Maryland Public Service Commission				
FirstEnergy, Inc.	08/18	Potomac Edison Company	Case No. 9490	Rate of Return

SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Massachusetts Department of Public Utilities				
Liberty Utilities	07/15	Liberty Utilities d/b/a New England Natural Gas Company	Docket No. 15-75	Rate of Return
Mississippi Public Service Commission				
Atmos Energy	03/19	Atmos Energy	Docket No. 2015-UN-049	Capital Structure
Atmos Energy	07/18	Atmos Energy	Docket No. 2015-UN-049	Capital Structure
Missouri Public Service Commission				
Indian Hills Utility Operating Company, Inc.	10/17	Indian Hills Utility Operating Company, Inc.	Case No. SR-2017-0259	Rate of Return
Raccoon Creek Utility Operating Company, Inc.	09/16	Raccoon Creek Utility Operating Company, Inc.	Docket No. SR-2016-0202	Rate of Return
New Jersey Board of Public Utilities				
Aqua New Jersey, Inc.	12/18	Aqua New Jersey, Inc.	Docket No. WR18121351	Rate of Return
Middlesex Water Company	10/17	Middlesex Water Company	Docket No. WR17101049	Rate of Return
Middlesex Water Company	03/15	Middlesex Water Company	Docket No. WR15030391	Rate of Return
The Atlantic City Sewerage Company	10/14	The Atlantic City Sewerage Company	Docket No. WR14101263	Cost of Service / Rate Design
Middlesex Water Company	11/13	Middlesex Water Company	Docket No. WR1311059	Capital Structure
North Carolina Utilities Commission				
Carolina Water Service, Inc.	06/19	Carolina Water Service, Inc.	Docket No. W-354 Sub 364	Rate of Return
Carolina Water Service, Inc.	09/18	Carolina Water Service, Inc.	Docket No. W-354 Sub 360	Rate of Return
Aqua North Carolina, Inc.	07/18	Aqua North Carolina, Inc.	Docket No. W-218 Sub 497	Rate of Return
Public Utilities Commission of Ohio				
Aqua Ohio, Inc.	05/16	Aqua Ohio, Inc.	Docket No. 16-0907-WW-AIR	Rate of Return
Pennsylvania Public Utility Commission				
Valley Energy, Inc.	07/19	C&T Enterprises	Docket No. R-2019-3008209	Rate of Return

SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Wellsboro Electric Company	07/19	C&T Enterprises	Docket No. R-2019-3008208	Rate of Return
Citizens' Electric Company of Lewisburg	07/19	C&T Enterprises	Docket No. R-2019-3008212	Rate of Return
Steelton Borough Authority	01/19	Steelton Borough Authority	Docket No. A-2019-3006880	Valuation
Mahoning Township, PA	08/18	Mahoning Township, PA	Docket No. A-2018-3003519	Valuation
SUEZ Water Pennsylvania Inc.	04/18	SUEZ Water Pennsylvania Inc.	Docket No. R-2018-000834	Rate of Return
Columbia Water Company	09/17	Columbia Water Company	Docket No. R-2017-2598203	Rate of Return
Veolia Energy Philadelphia, Inc.	06/17	Veolia Energy Philadelphia, Inc.	Docket No. R-2017-2593142	Rate of Return
Emporium Water Company	07/14	Emporium Water Company	Docket No. R-2014-2402324	Rate of Return
Columbia Water Company	07/13	Columbia Water Company	Docket No. R-2013-2360798	Rate of Return
Penn Estates Utilities, Inc.	12/11	Penn Estates, Utilities, Inc.	Docket No. R-2011-2255159	Capital Structure / Long-Term Debt Cost Rate
South Carolina Public Service Commission				
Carolina Water Service, Inc.	02/18	Carolina Water Service, Inc.	Docket No. 2017-292-WS	Rate of Return
Carolina Water Service, Inc.	06/15	Carolina Water Service, Inc.	Docket No. 2015-199-WS	Rate of Return
Carolina Water Service, Inc.	11/13	Carolina Water Service, Inc.	Docket No. 2013-275-WS	Rate of Return
United Utility Companies, Inc.	09/13	United Utility Companies, Inc.	Docket No. 2013-199-WS	Rate of Return
Utility Services of South Carolina, Inc.	09/13	Utility Services of South Carolina, Inc.	Docket No. 2013-201-WS	Rate of Return
Tega Cay Water Services, Inc.	11/12	Tega Cay Water Services, Inc.	Docket No. 2012-177-WS	Capital Structure
Virginia State Corporation Commission				
WGL Holdings, Inc.	7/18	Washington Gas Light Company	PUR-2018-00080	Rate of Return
Atmos Energy Corporation	5/18	Atmos Energy Corporation	PUR-2018-00014	Rate of Return
Aqua Virginia, Inc.	7/17	Aqua Virginia, Inc.	PUR-2017-00082	Rate of Return

SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Massanutton Public Service Corp.	08/14	Massanutton Public Service Corp.	PUE-2014-00035	Rate of Return / Rate Design

Blue Granite Water Company
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to D'Ascendis Direct Exhibit No. 1

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Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model	DWD-3
Indicated Common Equity Cost Rate Using the Risk Premium Model	DWD-4
Indicated Common Equity Cost Rate Using the Capital Asset Pricing Model	DWD-5
Basis of selection for the Non-Price Regulated Companies Comparable in Total Risk to the Utility Proxy Group	DWD-6
Cost of Common Equity Models Applied to the Comparable Risk Non-Price Regulated Companies	DWD-7
Estimated Market Capitalization for Blue Granite Water Company and the Utility Proxy Group	DWD-8

Blue Granite Water Company
Recommended Capital Structure and Cost Rates
for Ratemaking Purposes
at June 30, 2019

<u>Type Of Capital</u>	<u>Ratios (1)</u>	<u>Cost Rate</u>	<u>Weighted Cost Rate</u>
Long-Term Debt	47.09%	5.73% (1)	2.70%
Common Equity	<u>52.91%</u>	10.20% - 10.70% (2)	<u>5.40%</u> - <u>5.66%</u>
Total	<u>100.00%</u>		<u>8.10%</u> - <u>8.36%</u>

Notes:

- (1) Company-Provided.
(2) From page 2 of this Schedule.

Blue Granite Water Company
Brief Summary of Common Equity Cost Rate

<u>Line No.</u>	<u>Principal Methods</u>	<u>Proxy Group of Six Water Companies</u>
1.	Discounted Cash Flow Model (DCF) (1)	9.03%
2.	Risk Premium Model (RPM) (2)	10.39%
3.	Capital Asset Pricing Model (CAPM) (3)	9.91%
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	<u>11.57%</u>
5.	Indicated Common Equity Cost Rate before Adjustment for Business Risk	10.20%
6.	Business Risk Adjustment (5)	<u>0.50%</u>
7.	Recommended Common Equity Cost Rate after Adjustment for Business Risk	<u>10.70%</u>
8.	Range of Common Equity Cost Rates	<u>10.20% - 10.70%</u>

- Notes: (1) From Schedule DWD-3.
(2) From page 1 of Schedule DWD-4.
(3) From page 1 of Schedule DWD-5.
(4) From page 1 of Schedule DWD-7.
(5) Business risk adjustment to reflect Blue Granite Water Company's greater business risk due to its unique risks as well as its small size relative to the proxy group as detailed in the accompanying direct testimony.

Proxy Group of Six Water Companies
CAPITALIZATION AND FINANCIAL STATISTICS (1)
2014 - 2018, Inclusive

	<u>2018</u>	<u>2017</u>	<u>2016</u>	<u>2015</u>	<u>2014</u>	
	(MILLIONS OF DOLLARS)					
<u>CAPITALIZATION STATISTICS</u>						
<u>AMOUNT OF CAPITAL EMPLOYED</u>						
TOTAL PERMANENT CAPITAL	\$2,806.355	\$2,520.354	\$2,397.831	\$2,285.766	\$2,178.876	
SHORT-TERM DEBT	\$198.340	\$212.952	\$175.872	\$117.184	\$94.428	
TOTAL CAPITAL EMPLOYED	<u>\$3,004.695</u>	<u>\$2,733.306</u>	<u>\$2,573.703</u>	<u>\$2,402.950</u>	<u>\$2,273.304</u>	
<u>INDICATED AVERAGE CAPITAL COST RATES (2)</u>						
TOTAL DEBT	4.852 %	4.97 %	5.182 %	5.248 %	5.393 %	
PREFERRED STOCK	5.92 %	5.91 %	5.91 %	5.91 %	5.67 %	
						<u>5 YEAR</u>
						<u>AVERAGE</u>
<u>CAPITAL STRUCTURE RATIOS</u>						
BASED ON TOTAL PERMANENT CAPITAL:						
LONG-TERM DEBT	45.14 %	43.47 %	44.03 %	44.81 %	44.08 %	44.31 %
PREFERRED STOCK	0.11	0.12	0.13	0.13	0.14	0.12
COMMON EQUITY	54.75	56.41	55.84	55.06	55.78	<u>55.57</u>
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
BASED ON TOTAL CAPITAL:						
TOTAL DEBT, INCLUDING SHORT-TERM	48.62 %	47.48 %	46.82 %	46.30 %	46.28 %	47.10 %
PREFERRED STOCK	0.10	0.11	0.12	0.13	0.14	0.12
COMMON EQUITY	51.28	52.41	53.06	53.57	53.58	<u>52.78</u>
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>FINANCIAL STATISTICS</u>						
<u>FINANCIAL RATIOS - MARKET BASED</u>						
EARNINGS / PRICE RATIO	3.56 %	3.46 %	3.73 %	4.55 %	4.84 %	4.03 %
MARKET / AVERAGE BOOK RATIO	307.51	303.79	271.29	219.78	202.93	261.06
DIVIDEND YIELD	2.05	2.06	2.31	2.83	3.00	2.45
DIVIDEND PAYOUT RATIO	57.39	59.63	61.35	61.54	61.49	60.28
<u>RATE OF RETURN ON AVERAGE BOOK COMMON EQUITY</u>	10.83 %	10.43 %	9.97 %	9.90 %	9.74 %	10.17 %
<u>TOTAL DEBT / EBITDA (3)</u>	3.98 x	3.43 x	3.42 x	3.46 x	3.54 x	3.56 x
<u>FUNDS FROM OPERATIONS / TOTAL DEBT (4)</u>	23.84 %	25.57 %	23.90 %	26.23 %	26.00 %	25.11 %
<u>TOTAL DEBT / TOTAL CAPITAL</u>	48.62 %	47.48 %	46.82 %	46.30 %	46.28 %	47.10 %

Notes:

- (1) All capitalization and financial statistics for the group are the arithmetic average of the achieved results for each individual company in the group, and are based upon financial statements as originally reported in each year.
- (2) Computed by relating actual total debt interest or preferred stock dividends booked to average of beginning and ending total debt or preferred stock reported to be outstanding.
- (3) Total debt relative to EBITDA (Earnings before Interest, Income Taxes, Depreciation and Amortization).
- (4) Funds from operations (sum of net income, depreciation, amortization, net deferred income tax and investment tax credits, less total AFUDC) plus interest charges as a percentage of total debt.

Source of Information: Company Annual Forms 10-K

Capital Structure Based upon Total Permanent Capital for the
Proxy Group of Six Water Companies
2014 - 2018, Inclusive

	<u>2018</u>	<u>2017</u>	<u>2016</u>	<u>2015</u>	<u>2014</u>	<u>5 YEAR AVERAGE</u>
<u>American States Water Co.</u>						
Long-Term Debt	36.54 %	37.75 %	39.40 %	41.15 %	39.15 %	38.80 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>63.46</u>	<u>62.25</u>	<u>60.60</u>	<u>58.85</u>	<u>60.85</u>	<u>61.20</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>American Water Works Company Inc</u>						
Long-Term Debt	56.55 %	55.81 %	54.74 %	53.89 %	52.70 %	54.74 %
Preferred Stock	0.05	0.07	0.09	0.11	0.15	0.09
Common Equity	<u>43.40</u>	<u>44.12</u>	<u>45.17</u>	<u>46.00</u>	<u>47.15</u>	<u>45.17</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Artesian Resources Corporation</u>						
Long-Term Debt	43.42 %	42.17 %	42.71 %	44.23 %	45.81 %	43.67 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>56.58</u>	<u>57.83</u>	<u>57.29</u>	<u>55.77</u>	<u>54.19</u>	<u>56.33</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>California Water Service Group</u>						
Long-Term Debt	52.74 %	43.40 %	45.83 %	44.69 %	40.46 %	45.42 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>47.26</u>	<u>56.60</u>	<u>54.17</u>	<u>55.31</u>	<u>59.54</u>	<u>54.58</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Middlesex Water Co.</u>						
Long-Term Debt	38.94 %	38.65 %	38.91 %	40.44 %	41.55 %	39.70 %
Preferred Stock	0.59	0.64	0.68	0.69	0.71	0.66
Common Equity	<u>60.47</u>	<u>60.71</u>	<u>60.41</u>	<u>58.87</u>	<u>57.74</u>	<u>59.64</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>York Water Co.</u>						
Long-Term Debt	42.68 %	43.02 %	42.60 %	44.46 %	44.81 %	43.51 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>57.32</u>	<u>56.98</u>	<u>57.40</u>	<u>55.54</u>	<u>55.19</u>	<u>56.49</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Proxy Group of Six Water Companies</u>						
Long-Term Debt	45.14 %	43.47 %	44.03 %	44.81 %	44.08 %	44.31 %
Preferred Stock	0.11	0.12	0.13	0.13	0.14	0.12
Common Equity	<u>54.75</u>	<u>56.41</u>	<u>55.84</u>	<u>55.06</u>	<u>55.78</u>	<u>55.57</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>

Source of Information
Annual Forms 10-K

Blue Granite Water Company
Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for
Proxy Group of Six Water Companies

[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
	Value Line Projected Five Year Growth in EPS (2)	Reuters Mean Consensus Projected Five Year Growth Rate in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth in EPS (3)	Adjusted Dividend Yield (4)	Indicated Common Equity Cost Rate (5)
Proxy Group of Six Water Companies	Average Dividend Yield (1)						
American States Water Co.	1.64 %	NA %	8.00 %	6.00 %	7.33 %	1.70 %	9.03 %
American Water Works Company Inc	1.74	10.60	8.10	8.20	9.10	1.82	10.92
Artesian Resources Corporation	2.70	NA	NA	4.00	4.00	2.75	6.75
California Water Service Group	1.55	NA	10.00	9.80	9.27	1.62	10.89
Middlesex Water Co.	1.59	NA	NA	2.70	5.10	1.63	6.73
York Water Co.	1.96	NA	NA	4.90	7.20	2.03	9.23
						Average	8.93 %
						Median	9.13 %
						Average of Mean and Median	9.03 %

NA= Not Available

Notes:

- (1) Indicated dividend at 07/31/2019 divided by the average closing price of the last 60 trading days ending 07/31/2019 for each company.
- (2) From pages 2 through 7 of this Schedule.
- (3) Average of columns 2 through 5 excluding negative growth rates.
- (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 6) x column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for American States Water Co., $1.64\% \times (1 + (1/2 \times 7.33\%)) = 1.70\%$.
- (5) Column 6 + column 7.

Source of Information:

Value Line Investment Survey
www.reuters.com Downloaded on 07/31/2019
www.zacks.com Downloaded on 07/31/2019
www.yahoo.com Downloaded on 07/31/2019

AMER. STATES WATER NYSE-AWR										RECENT PRICE	74.38	P/E RATIO	38.1 (Trailing: 41.8 Median: 21.0)	RELATIVE P/E RATIO	2.23	DIV'D YLD	1.6%	VALUE LINE	Target Price Range																	
TIMELINESS	2	Lowered 5/24/19		High: 21.0	19.4	19.8	18.2	24.1	33.1	38.7	44.1	47.2	58.4	69.6	76.4				2022	2023	2024															
SAFETY	2	Raised 7/20/12		Low: 13.5	14.9	15.6	15.3	17.0	24.0	27.0	35.8	37.3	41.1	50.1	63.3																					
TECHNICAL	1	Raised 7/12/19		<div>LEGENDS</div> <div>1.35 x Dividends p sh divided by Interest Rate</div> <div>.... Relative Price Strength</div> <div>2-for-1 split 9/13</div> <div>Options: Yes</div> <div>Shaded area indicates recession</div>																																
BETA	.70	(1.00 = Market)																																		
2022-24 PROJECTIONS																																				
High	Price	Gain	Return																																	
Low	75	(Nil)	2%																																	
Insider Decisions																																				
Institutional Decisions																																				
CAPITAL STRUCTURE as of 3/31/19																																				
Total Debt \$416.9 mill. Due in 5 Yrs \$100.7 mill.																																				
LT Debt \$376.6 mill. LT Interest \$24.0 mill. (33% of Cap'l)																																				
Leases, Uncapitalized: Annual rentals \$2.6 mill.																																				
Pension Assets-12/18 \$162.5 mill. Oblig. \$196.1 mill.																																				
Pfd Stock None																																				
Common Stock 36,795,218 shs. as of 5/2/19																																				
MARKET CAP: \$2.7 billion (Mid Cap)																																				
CURRENT POSITION (\$MILL.)																																				
Cash Assets																																				
Accts Receivable																																				
Other																																				
Current Assets																																				
Accts Payable																																				
Debt Due																																				
Other																																				
Current Liab.																																				
ANNUAL RATES of change (per sh)																																				
Past 10 Yrs.																																				
Past 5 Yrs.																																				
Est'd '16-'18 to '22-'24																																				
Revenues																																				
"Cash Flow"																																				
Earnings																																				
Dividends																																				
Book Value																																				
Cal-endar																																				
QUARTERLY REVENUES (\$ mill.)																																				
Mar.31 Jun.30 Sep.30 Dec.31																																				
2016																																				
2017																																				
2018																																				
2019																																				
2020																																				
Cal-endar																																				
EARNINGS PER SHARE A																																				
Mar.31 Jun.30 Sep.30 Dec.31																																				
2016																																				
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2019																																				
2020																																				
Cal-endar																																				
QUARTERLY DIVIDENDS PAID B																																				
Mar.31 Jun.30 Sep.30 Dec.31																																				
2015																																				
2016																																				
2017																																				
2018																																				
2019																																				

BUSINESS: American States Water Co. operates as a holding company. Through its principal subsidiary, Golden State Water Co., it supplies water to 259,919 customers in 70 cities in 10 counties. Service areas include the metropolitan areas of Los Angeles and Orange Counties. The company also provides electricity to 24,353 customers in Big Bear Lake and San Bernardino Cnty. Provides water & wastewater services to U.S. military bases through its ASUS sub. Sold Chaparral City Wtr. of AZ. (6/11). Employs about 815. BlackRock, Inc. owns 15.1% of out. shares; Vanguard, 11.5%; off. & dir. 1.2%. (4/19 Proxy). Chairman: Lloyd Ross. Pres. & CEO: Robert Sprowls. Inc: CA. Addr.: 630 East Foothill Blvd., San Dimas, CA 91773. Tel: 909-394-3600. Internet: www.aswater.com.

American States Water has been granted rate relief. In June, the California Public Utility Commission (CPUC) handed down a final ruling on the Golden State Water (GSWC) subsidiary's 2017 petition seeking to raise customers' bills. Actually, the CPUC agreed to a prior settlement made between the utility and the CPUC's Public Advocate Office. According to the ruling, the increased revenue will be retroactive to the beginning of this year. California works on a three-year cycle, so rates are now established through 2021, which removes some of GSWC's regulatory risk. The water utility was also authorized to spend \$335 million to upgrade existing pipelines and other assets.

The nonregulated operations are boosting the bottom line. Through its ASUS subsidiary, American States provides water services to U.S. military bases. In the first quarter, this sector was responsible for 31% of the company's net income, compared to 17% in the similar year-ago period. Increased earnings were the result of ongoing construction at Fort Riley, KS along with greater management fees from more activity at other bases.

While the rate of growth may slow here, many military bases are privatizing their water services, and we expect the company to win a fair share of this new business. Since this sector is nonregulated, earnings from here are not capped, as they are in the utility operations.

Earnings prospects are good. The implementation of higher rates together with the greater contributions from ASUS should enable American States' share net to rise by double digits in 2019. Next year should be solid too, as share earnings could increase another 7%.

These timely shares do not hold much appeal for utility investors. Like many in this group, AWR has soared in value over the past few years. Thus, income-oriented investors could probably do better elsewhere. (As an alternative, the three-month Treasury note offers a higher yield while being virtually risk free.) At the recent quotation, all of American States' positives appear to be reflected in the stock price. Indeed, the equity is trading close to the high end of its projected 2022-2024 Target Price Range.

James A. Flood
July 12, 2019

AMERICAN WATER NYSE-AWK					RECENT PRICE	115.73	P/E RATIO	32.1	(Trailing: 36.4 Median: 19.0)	RELATIVE P/E RATIO	1.88	DIV'D YLD	1.8%	VALUE LINE						
TIMELINESS	1	Raised 4/5/19	High: 23.7	23.0	25.8	32.8	39.4	45.1	56.2	61.2	85.2	92.4	98.2	119.3	Target Price	Range				
SAFETY	3	New 7/25/08	Low: 16.5	16.2	19.4	25.2	31.3	37.0	41.1	48.4	58.9	70.0	76.0	88.0	2022	2023	2024			
TECHNICAL	2	Raised 7/12/19	LEGENDS													200				
BETA	.60	(1.00 = Market)	1.10 x Dividends p.sh. divided by Interest Rate													160				
															Options: Yes					
															Shaded area indicates recession					
2022-24 PROJECTIONS																				
Price		Gain	Ann'l Total																	
High	120	(+5%)	3%																	
Low	80	(-30%)	-6%																	
Insider Decisions																				
S O N D J F M A M																				
to Buy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Options	1	0	0	0	7	9	0	0	12											
to Sell	1	0	0	0	0	0	0	0	5											
Institutional Decisions																				
3Q2018		4Q2018	1Q2019																	
to Buy	290	362	364																	
to Sell	309	287	325																	
Hld's(000)	154530	155716	155942																	
Percent shares traded				21	14	7														
% TOT. RETURN 6/19																				
THIS STOCK VL ARITH.																				
1 yr. 38.6 -1.2																				
3 yr. 45.8 33.7																				
5 yr. 161.2 35.3																				
2003	2004	2005	2006E	2007E	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	© VALUE LINE PUB. LLC	22-24	
--	--	--	--	13.08	14.61	13.98	15.49	15.18	16.25	16.28	16.78	17.72	18.54	18.81	19.04	19.95	20.95	Revenues per sh	23.80	
--	--	--	--	.65	d.47	2.87	2.89	3.56	3.73	4.27	4.36	4.75	5.13	5.26	5.14	6.15	6.75	7.05	"Cash Flow" per sh	8.30
--	--	--	--	d.97	d2.14	1.10	1.25	1.53	1.72	2.11	2.06	2.39	2.64	2.62	2.38	3.15	3.60	3.85	Earnings per sh ^A	4.70
--	--	--	--	--	--	.40	.82	.86	.90	1.21	.84	1.21	1.33	1.47	1.62	1.78	1.96	2.10	Div'd Decl'd per sh ^B	2.75
--	--	--	--	4.31	4.74	6.31	4.50	4.38	5.27	5.25	5.50	5.33	6.51	7.36	8.04	8.78	9.15	9.15	Cap'l Spending per sh	9.00
--	--	--	--	23.86	28.39	25.64	22.91	23.59	24.11	25.11	26.52	27.39	28.25	29.24	30.13	32.42	34.55	36.55	Book Value per sh ^D	41.25
--	--	--	--	160.00	160.00	160.00	174.63	175.00	175.66	176.99	178.25	179.46	178.28	178.10	178.44	180.68	181.00	182.00	Common Shs Outst'g ^C	189.00
--	--	--	--	--	--	18.9	15.6	14.6	16.8	16.7	19.9	20.0	20.5	27.7	33.8	27.3	Bold figures are Value Line estimates		Avg Ann'l P/E Ratio	21.5
--	--	--	--	--	--	1.14	1.04	.93	1.05	1.06	1.12	1.05	1.03	1.45	1.70	1.47			Relative P/E Ratio	1.20
--	--	--	--	--	--	1.9%	4.2%	3.8%	3.1%	3.4%	2.0%	2.5%	2.5%	2.0%	2.0%	2.1%			Avg Ann'l Div'd Yield	2.8%
CAPITAL STRUCTURE as of 3/31/19					2440.7	2710.7	2666.2	2876.9	2901.9	3011.3	3159.0	3302.0	3357.0	3440.0	3615	3815	Revenues (\$mill)	4500		
Total Debt \$8831.0 mil. Due in 5 Yrs \$1555.0 mil.					209.9	267.8	304.9	374.3	369.3	429.8	476.0	468.0	426.0	567.0	650	700	Net Profit (\$mill)	890		
LT Debt \$7562.0 mil. LT Interest \$328.0 mil. (56% of Cap'l)					37.9%	40.4%	39.5%	40.7%	39.1%	39.4%	39.1%	39.2%	53.3%	28.2%	21.0%	21.0%	Income Tax Rate	21.0%		
Leases, Uncapitalized: Annual rentals \$17.0 mil.					--	--	--	6.2%	5.1%	--	--	--	5.1%	4.0%	5.0%	5.0%	AFUDC % to Net Profit	5.0%		
Pension Assets12/18 \$1499.0 mill					56.9%	56.8%	55.7%	53.9%	52.4%	52.4%	53.7%	52.4%	54.7%	56.3%	57.0%	58.0%	Long-Term Debt Ratio	59.0%		
Oblig. \$1892.0 mill.					43.1%	43.2%	44.2%	46.1%	47.6%	47.4%	46.2%	47.5%	45.3%	43.6%	43.0%	42.0%	Common Equity Ratio	41.0%		
Pfd Stock \$7.0 mill. Pfd Div'd \$4 mill					9289.0	9561.3	9580.3	9635.5	9940.7	10364	10911	10967	11875	13433	14600	15700	Total Capital (\$mill)	18800		
Common Stock 180,518,810 shs. as of 4/25/19					10524	11059	11021	11739	12391	12900	13933	14992	16246	17409	18500	19500	Net Plant (\$mill)	22500		
MARKET CAP: \$20.9 billion (Large Cap)					3.8%	4.4%	4.8%	5.4%	5.1%	5.5%	5.7%	5.6%	4.9%	5.4%	5.5%	5.5%	Return on Total Cap'l	6.0%		
CURRENT POSITION					5.2%	6.5%	7.2%	8.4%	7.8%	8.7%	9.4%	9.0%	7.9%	9.7%	10.5%	10.5%	Return on Shr. Equity	11.5%		
CASH ASSETS					5.2%	6.5%	7.2%	8.4%	7.8%	8.7%	9.4%	9.0%	7.9%	9.7%	10.5%	10.5%	Return on Com Equity	11.5%		
ACCTS RECEIVABLE					1.8%	2.8%	3.5%	3.6%	4.7%	4.3%	4.7%	4.0%	2.5%	4.2%	5.0%	5.0%	Retained to Com Eq	5.0%		
OTHER					65%	56%	52%	57%	40%	50%	50%	56%	68%	56%	54%	55%	All Div'ds to Net Prof	59%		
CURRENT ASSETS					82	158	85	BUSINESS: American Water Works Company, Inc. is the largest investor-owned water and wastewater utility in the U.S., providing services to more than 14 million people in 46 states and Ontario, Canada. Nonregulated business assists municipalities and military bases with the maintenance and upkeep as well. Regulated operations made up 87% of 2018 revenues. New Jersey is its largest market accounting for 24% of regulated revenues; Pennsylvania, 23%. Has 7,100 employees. The Vanguard Grp. owns 11.0% of outstanding shares; BlackRock, Inc., 7.9%; officers & directors, less than 1.0%. (3/19 Proxy). President & CEO: Susan N. Story. Chairman: George MacKenzie. Address: 1 Water Street, Camden, NJ 08102. Tel.: 856-346-8200. Internet: www.amwater.com.												
ACCTS PAYABLE					272	301	307													
DEBT DUE					366	322	299													
OTHER					720	781	691													
ANNUAL RATES of change (per sh)					195	175	130	Shares of American Water Works continue to soar. Once again, the water utility's stock has outperformed the S&P 500 by a wide margin. In the second quarter, AWK rose over 11%, versus a 4% increase in the broader market. This trend has been ongoing since mid-2015.												
REVENUES					1227	1035	1269													
EARNINGS					903	884	757													
DIVIDENDS					2325	2094	2156													
BOOK VALUE					82	158	85	Our ranking system favors the stock. AWK is ranked Highest (1) for relative price performance in the year ahead. Based on other financial metrics, such as P/E ratio and dividend yield, however, the equity seems more than fully valued.												
PAST 10 YRS.					272	301	307													
PAST 5 YRS.					366	322	299													
EST'D '16-'18 to '22-'24					720	781	691													
QUARTERLY REVENUES (\$ mill.)					195	175	130	Long-term investors should avoid this equity. Indeed, the price of AWK almost exceeded our Target Price Range projection through 2022-2024. Most of this can probably be attributed to the Federal Reserve's indicating that monetary policy will be easier going forward. Income-oriented accounts should be aware that they can get a higher yield with much less risk by owning the three-month Treasury note. In any case, only those who believe there is a secular shift under way in how the market evaluates water stocks should consider AWK.												
MAR.31					272	301	307													
JUN.30					366	322	299													
SEP.30					720	781	691													
DEC.31					195	175	130	prospects remain bright. In 2018, American Water had a very strong first two quarters thanks to rate hikes. Still, we think that share earnings were able to equal these difficult comparisons. The water utility's acquisition strategy (see below) and cost-control efforts are the driving force behind the strong bottom-line growth, which we expect to continue.												
2016					1227	1035	1269													
2017					903	884	757													
2018					2325	2094	2156													
2019					2325	2094	2156	Acquisition activity should pick up in the second half. The first two quarters of this year were quiet as American Water only purchased five water districts, which added 4,700 customers. By the end of 2019, however, nine additional purchases are expected to be closed for 62,000 customers. These opportunities exist because of the fragmented nature of the water industry. The company can absorb smaller districts and use economies of scale to operate them more profitably.												
2020					835	950	1080											950	3640	3815
2021					835	950	1080											950	3640	3815
2022					835	950	1080											950	3640	3815
EARNINGS PER SHARE ^A					.46	.77	.83	.57	2.62	The capital budget is considerable. American Water has a five year-construction budget of \$8.3 billion. More debt will be required to finance this program, but we expect the company's balance sheet to remain in adequate shape.										
MAR.31					.52	.73	1.12	.01	2.38											
JUN.30					.59	.91	1.03	.62	3.15											
SEP.30					.62	.90	1.20	.88	3.60											
DEC.31					.60	.88	1.25	1.12	3.85	The company's earnings and dividend										
2016					.31	.34	.34	.34	1.33											
2017					.34	.375	.375	.375	1.47											
2018					.375	.415	.415	.415	1.62											
2019					.415	.455	.455	.455	1.78	James A. Flood										
2020					.455	.50														
2021					.455	.50														
2022					.455	.50														

ARTESIAN RES. CORP. NDQ--ARTNA				RECENT PRICE	36.21	TRAILING P/E RATIO	23.4	RELATIVE P/E RATIO	1.39	DIV'D YLD	2.7%	VALUE LINE	
RANKS		19.99 15.16	24.43 18.20	24.27 21.52	23.82 19.85	29.16 20.00	35.00 25.17	43.22 29.37	41.92 32.00	40.97 33.14		High Low	
PERFORMANCE	3	Average											45
Technical	3	Average											30
SAFETY	3	Average											22.5
BETA	.65	(1.00 = Market)											13
													9
Financial Strength	B												6
Price Stability	65												4
Price Growth Persistence	40												3
Earnings Predictability	85												550 VOL. (thous.)
© VALUE LINE PUBLISHING LLC													
		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020/2021		
SALES PER SH		7.56	8.10	7.82	8.13	8.50	8.67	8.92	8.69	--			
"CASH FLOW" PER SH		1.64	2.04	1.87	2.04	2.22	2.43	2.55	2.66	--			
EARNINGS PER SH		.83	1.13	.94	1.07	1.26	1.41	1.51	1.54	NA	NA/NA		
DIV'DS DECL'D PER SH		.76	.79	.82	.85	.87	.90	.93	.96	--			
CAP'L SPENDING PER SH		1.83	2.36	2.40	2.66	2.28	3.10	4.46	5.30	--			
BOOK VALUE PER SH		13.12	13.57	13.80	14.09	14.61	15.23	15.91	16.57	--			
COMMON SHS OUTST'G (MILL)		8.61	8.71	8.83	8.91	9.06	9.13	9.22	9.25	--			
AVG ANN'L P/E RATIO		22.5	18.3	23.9	20.5	18.0	20.9	24.2	23.9	NA	NA/NA		
RELATIVE P/E RATIO		1.41	1.17	1.34	1.08	.93	1.14	1.21	1.35	--			
AVG ANN'L DIV'D YIELD		4.1%	3.8%	3.7%	3.9%	3.8%	3.1%	2.5%	2.6%	--			
SALES (\$MILL)		65.1	70.6	69.1	72.5	77.0	79.1	82.2	80.4	--	Bold figures are consensus earnings estimates and, using the recent prices, P/E ratios.		
OPERATING MARGIN		45.5%	48.7%	47.0%	48.8%	43.0%	44.4%	44.6%	46.1%	--			
DEPRECIATION (\$MILL)		7.4	7.9	8.3	8.7	8.8	9.2	9.6	10.3	--			
NET PROFIT (\$MILL)		6.7	9.8	8.3	9.5	11.3	13.0	14.0	14.3	--			
INCOME TAX RATE		40.8%	40.2%	40.2%	40.1%	--	--	--	--	--			
NET PROFIT MARGIN		10.4%	14.0%	12.0%	13.1%	14.7%	16.4%	17.0%	17.8%	--			
WORKING CAP'L (\$MILL)		d11.4	d11.4	d12.3	d13.5	d8.8	d4.7	d9.5	d21.6	--			
LONG-TERM DEBT (\$MILL)		106.5	106.3	105.5	105.0	103.6	102.3	105.6	115.9	--			
SHR. EQUITY (\$MILL)		113.0	118.2	121.8	125.6	132.3	139.0	146.6	153.3	--			
RETURN ON TOTAL CAP'L		4.6%	5.9%	5.1%	5.5%	6.3%	6.7%	6.8%	6.5%	--			
RETURN ON SHR. EQUITY		6.0%	8.3%	6.8%	7.6%	8.5%	9.3%	9.5%	9.3%	--			
RETAINED TO COM EQ		.5%	2.5%	.9%	1.6%	2.6%	3.4%	3.7%	3.6%	--			
ALL DIV'DS TO NET PROF		92%	70%	87%	79%	69%	63%	61%	62%	--			
Note: No analyst estimates available.													
ANNUAL RATES						ASSETS (\$mill.)						INDUSTRY: Water Utility	
of change (per share)						2017 2018 3/31/19						BUSINESS: Artesian Resources Corp. operates as the holding company of nine wholly-owned subsidiaries offering water, wastewater and other services in Delaware, Maryland and Pennsylvania. Artesian Water, its principal subsidiary, distributes and sells water to residential, commercial, industrial, governmental, municipal, and utility customers throughout Delaware. In addition, Artesian Water provides services to other water utilities, including operations and billing functions, and has contract operation agreements with private and municipal water providers. It also provides water for public and private fire protection to customers in service territories. Artesian supplies 7.9 billion gallons of water per year through 1,311 miles of main to over 300,000 people. Artesian Wastewater Management, Inc. is a regulated entity that owns wastewater collection and treatment infrastructure and provides wastewater services to customers in Delaware. Has 241 employees. Chairman, C.E.O. & President: Dian C. Taylor. Address: 664 Churchmans Rd., Newark, DE 19702. Tel.: (302) 453-6900. Internet: www.artesianresources.com. E.B. July 12, 2019	
5 Yrs. 1 Yr.						1.0 .3 .3							
Sales 2.5% -2.5%						8.9 8.2 7.0							
"Cash Flow" 6.5% 4.0%						1.5 1.5 1.6							
Earnings 9.0% 2.0%						7.6 6.1 4.3							
Dividends 3.0% 3.0%						19.0 16.1 13.2							
Book Value 3.5% 4.0%													
Fiscal Year						Property, Plant & Equip, at cost 582.0 629.4 --						TOTAL SHAREHOLDER RETURN Dividends plus appreciation as of 6/30/2019	
1Q 2Q 3Q 4Q						Accum Depreciation 117.6 126.9 --							
12/31/17 19.2 20.5 22.3 20.2 82.2						Net Property 464.4 502.5 508.6							
12/31/18 18.9 20.2 21.9 19.4 80.4						Other 11.2 11.2 12.0							
12/31/19 19.4						Total Assets 494.6 529.8 533.8							
12/31/20													
Fiscal Year						LIABILITIES (\$mill.)							
1Q 2Q 3Q 4Q						Accts Payable 9.2 8.3 5.2							
12/31/16 .30 .33 .48 .30 1.41						Debt Due 11.0 17.7 20.4							
12/31/17 .34 .35 .42 .40 1.51						Other 8.3 11.7 14.9							
12/31/18 .38 .42 .42 .32 1.54						Current Liab 28.5 37.7 40.5							
12/31/19 .39													
12/31/20													
Cal-endar						LONG-TERM DEBT AND EQUITY as of 3/31/19							
1Q 2Q 3Q 4Q						Total Debt \$135.8 mill. Due in 5 Yrs. NA							
2016 .222 .225 .225 .228 .90						LT Debt \$115.4 mill.							
2017 .228 .232 .232 .235 .93						Including Cap. Leases NA							
2018 .235 .239 .239 .242 .96						(43% of Cap'l)							
2019 .242 .246 .246						Leases, Uncapitalized Annual rentals NA							
INSTITUTIONAL DECISIONS						Pension Liability None in '18 vs. None in '17							
3Q'18 4Q'18 1Q'19						Pfd Stock None Pfd Div'd Paid None							
to Buy 40 38 39						Common Stock 9,275,000 shares (57% of Cap'l)							
to Sell 26 27 32													
Hld's(000) 3582 3846 3896													

<p>(A) Basic EPS. Excl. nonrecurring gain (loss): '11, 4¢. Next earnings report due late August. (B) Dividends historically paid in late Feb., May, Aug., and Nov. ■ Div'd reinvestment plan</p>	<p>available. (C) Incl. intangible assets. In '18 : \$24.7 mill., \$0.51/sh. (D) In millions, adjusted for splits.</p>	<p>(E) Excludes non-reg. rev.</p>	<p>Company's Financial Strength Stock's Price Stability Price Growth Persistence Earnings Predictability</p>	<p>B++ 80 45 65</p>
<p>© 2019 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.</p>			<p>To subscribe call 1-800-VALUELINE</p>	

MIDDLESEX WATER NDQ-MSEX				RECENT PRICE	59.36	P/E RATIO	27.6 (Trailing: 28.5 Median: 21.0)	RELATIVE P/E RATIO	1.61	DIV'D YLD	1.6%	VALUE LINE							
TIMELINESS	3	Lowered 5/24/19	High: 19.8 Low: 12.0	17.9 11.6 19.3 14.7	19.4 16.5 19.6 17.5	22.5 18.6 23.7 19.1	28.0 21.2 44.5 25.0	46.7 32.2 60.3 34.0	63.7 51.0			Target Price Range 2022 2023 2024							
SAFETY	2	New 10/21/11	LEGENDS																
TECHNICAL	1	Raised 6/28/19	1.20 x Dividends p sh divided by Interest Rate																
BETA	.75	(1.00 = Market) Relative Price Strength																
Options: Yes																			
Shaded area indicates recession																			
2022-24 PROJECTIONS																			
Price	Gain	Ann'l Total																	
High 60	45	(Nil)																	
Low 45	(-25%)	2%																	
Insider Decisions																			
S O N D J F M A M																			
to Buy 0 0 0 0 0 0 0 0 0 0 0 0 0																			
Options 0 0 0 0 0 0 0 0 0 0 0 0 0																			
to Sell 0 1 0 0 1 0 3 0 2																			
Institutional Decisions																			
3Q2018 4Q2018 1Q2019																			
to Buy 54 76 72																			
to Sell 50 52 67																			
Hid's(000) 9294 9247 9424																			
Percent shares traded 12 8 4																			
© VALUE LINE PUB. LLC 22-24																			
2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Revenues per sh	9.70
6.12	6.25	6.44	6.16	6.50	6.79	6.75	6.60	6.50	6.98	7.19	7.26	7.77	8.16	8.00	8.42	8.55	8.70	"Cash Flow" per sh	3.50
1.15	1.28	1.33	1.33	1.49	1.53	1.40	1.55	1.46	1.56	1.72	1.84	1.97	2.17	2.24	2.89	3.05	3.15	Earnings per sh A	2.45
.61	.73	.71	.82	.87	.89	.72	.96	.84	.90	1.03	1.13	1.22	1.38	1.38	1.96	2.15	2.25	Div'd Decl'd per sh B	1.15
.65	.66	.67	.68	.69	.70	.71	.72	.73	.74	.75	.76	.78	.81	.86	.91	.97	1.00	Cap'l Spending per sh	3.50
1.87	2.54	2.18	2.31	1.66	2.12	1.49	1.90	1.50	1.36	1.26	1.40	1.59	2.91	3.08	4.40	3.50	3.50	Book Value per sh	17.65
7.60	8.02	8.26	9.52	10.05	10.03	10.33	11.13	11.27	11.48	11.82	12.24	12.74	13.40	14.02	15.17	15.75	16.10	Common Shs Outst'g C	17.00
10.48	11.36	11.58	13.17	13.25	13.40	13.52	15.57	15.70	15.82	15.96	16.12	16.23	16.30	16.35	16.40	16.50	16.75	Avg Ann'l P/E Ratio	21.0
30.0	26.4	27.4	22.7	21.6	19.8	21.0	17.8	21.7	20.8	19.7	18.5	19.1	25.6	28.4	22.2	22.2	22.2	Relative P/E Ratio	1.15
1.71	1.39	1.46	1.23	1.15	1.19	1.40	1.13	1.36	1.32	1.11	.97	.96	1.34	1.43	1.20	1.20	1.20	Avg Ann'l Div'd Yield	2.2%
3.5%	3.4%	3.5%	3.7%	3.7%	4.0%	4.7%	4.2%	4.0%	4.0%	3.7%	3.7%	3.3%	2.3%	2.2%	2.1%	2.1%	2.1%		
CAPITAL STRUCTURE as of 3/31/19													141 146		165 165		165 165		
Total Debt \$215.2 mill. Due in 5 Yrs \$56.8 mill.													35.5 37.5		41.5 41.5		41.5 41.5		
LT Debt \$158.4 mill. LT Interest \$6.8 mill.													22.7 22.8		32.5 32.5		32.5 32.5		
(Total interest coverage: 9.3x)													22.7 22.8		32.5 32.5		32.5 32.5		
(38% of Cap'l)													22.7 22.8		32.5 32.5		32.5 32.5		
Pension Assets-12/18 \$66.8 mill.													22.7 22.8		32.5 32.5		32.5 32.5		
Oblig. \$83.9 mill.													22.7 22.8		32.5 32.5		32.5 32.5		
Pfd Stock \$2.4 mill. Pfd Div'd: \$.1 mill.													22.7 22.8		32.5 32.5		32.5 32.5		
Common Stock 16,468,462 shs. as of 4/30/19													22.7 22.8		32.5 32.5		32.5 32.5		
MARKET CAP: \$975 million (Small Cap)													22.7 22.8		32.5 32.5		32.5 32.5		
CURRENT POSITION (SMILL.)													22.7 22.8		32.5 32.5		32.5 32.5		
Cash Assets													22.7 22.8		32.5 32.5		32.5 32.5		
Other													22.7 22.8		32.5 32.5		32.5 32.5		
Current Assets													22.7 22.8		32.5 32.5		32.5 32.5		
Accts Payable													22.7 22.8		32.5 32.5		32.5 32.5		
Debt Due													22.7 22.8		32.5 32.5		32.5 32.5		
Other													22.7 22.8		32.5 32.5		32.5 32.5		
Current Liab.													22.7 22.8		32.5 32.5		32.5 32.5		
ANNUAL RATES													22.7 22.8		32.5 32.5		32.5 32.5		
Past 10 Yrs. Past 5 Yrs. Est'd '16-'18													22.7 22.8		32.5 32.5		32.5 32.5		
of change (per sh)													22.7 22.8		32.5 32.5		32.5 32.5		
Revenues													22.7 22.8		32.5 32.5		32.5 32.5		
"Cash Flow"													22.7 22.8		32.5 32.5		32.5 32.5		
Earnings													22.7 22.8		32.5 32.5		32.5 32.5		
Dividends													22.7 22.8		32.5 32.5		32.5 32.5		
Book Value													22.7 22.8		32.5 32.5		32.5 32.5		
QUARTERLY REVENUES (\$ mill.)													22.7 22.8		32.5 32.5		32.5 32.5		
Cal-endar													22.7 22.8		32.5 32.5		32.5 32.5		
Mar.31 Jun. 30 Sep. 30 Dec. 31													22.7 22.8		32.5 32.5		32.5 32.5		
2016													22.7 22.8		32.5 32.5		32.5 32.5		
2017													22.7 22.8		32.5 32.5		32.5 32.5		
2018													22.7 22.8		32.5 32.5		32.5 32.5		
2019													22.7 22.8		32.5 32.5		32.5 32.5		
2020													22.7 22.8		32.5 32.5		32.5 32.5		
EARNINGS PER SHARE A													22.7 22.8		32.5 32.5		32.5 32.5		
Cal-endar													22.7 22.8		32.5 32.5		32.5 32.5		
Mar.31 Jun. 30 Sep. 30 Dec. 31													22.7 22.8		32.5 32.5		32.5 32.5		
2016													22.7 22.8		32.5 32.5		32.5 32.5		
2017													22.7 22.8		32.5 32.5		32.5 32.5		
2018													22.7 22.8		32.5 32.5		32.5 32.5		
2019													22.7 22.8		32.5 32.5		32.5 32.5		
2020													22.7 22.8		32.5 32.5		32.5 32.5		
QUARTERLY DIVIDENDS PAID B													22.7 22.8		32.5 32.5		32.5 32.5		
Cal-endar													22.7 22.8		32.5 32.5		32.5 32.5		
Mar.31 Jun. 30 Sep. 30 Dec. 31													22.7 22.8		32.5 32.5		32.5 32.5		
2015													22.7 22.8		32.5 32.5		32.5 32.5		
2016													22.7 22.8		32.5 32.5		32.5 32.5		
2017													22.7 22.8		32.5 32.5		32.5 32.5		
2018													22.7 22.8		32.5 32.5		32.5 32.5		
2019													22.7 22.8		32.5 32.5		32.5 32.5		
2020													22.7 22.8		32.5 32.5		32.5 32.5		
BUSINESS: Middlesex Water Company engages in the ownership and operation of regulated water utility systems in New Jersey, Delaware, and Pennsylvania. It also operates water and wastewater systems under contract on behalf of municipal and private clients in NJ and DE. Its Middlesex System provides water services to 61,000 retail customers, primarily in Middlesex County, New Jersey. In 2018, the Middlesex System accounted for 59% of operating revenues. At 12/31/18, the company had 330 employees. Incorporated: NJ. President, CEO, and Chairman: Dennis W. Doll. Officers & directors own 3.5% of the com. stock; BlackRock Inst. Trust Co., 6.8% (4/19 proxy). Add.: 485 C Route 1 South, Suite 400, Iselin, NJ 08830. Tel.: 732-634-1500. Int.: www.middlesexwater.com.													22.7 22.8		32.5 32.5		32.5 32.5		
Middlesex Water posted an impressive double-digit bottom-line advance in the March period. Indeed, share net jumped nearly 45% year over year, to \$0.39, helped along by multiple drivers. First, operation and maintenance expense declined \$1.7 million, year over year. Roughly \$1.4 million in reductions is related to its revised long-term contract with the city of Perth Amboy whereby the company's subsidiary, USA-PA, is now relieved of subcontractor fees for wastewater services. The remaining \$0.3 million in cost savings stemmed from improved weather conditions during the period. Additionally, Middlesex's income tax bill shrank due to regulatory changes. We are adding a dime to our 2019 and 2020 earnings-per-share forecasts. We now look for net income of \$2.15 a share this year and \$2.25 a share in the next. However, our top-line outlooks are moving in the opposite direction. While the abovementioned contract boosts profitability, lower revenues appear to be an adverse side effect. Consequently, we are shaving \$2 million from our 2019 and 2020 revenue estimates, to \$141 million and \$146 million, respectively. Capital spending is apt to persist over the long haul. Major infrastructure upgrades on its water delivery and filtration systems are on tap as we head into next decade. More than \$100 million remains on the current allocation, with additional funding likely to follow. On balance, operating expenses should come down further, which may well lift share profits to \$2.45 over the pull to 2022-2024. But this issue holds little investment appeal at this juncture. Middlesex stock is slated to move in line with the year-ahead broader market averages. Meantime, upside over the 3- to -5 year stretch is limited, as MSEX shares are currently trading near fresh all-time highs. Traditionally, the water utility sector acts as a safe haven for conservative accounts during times of economic and market uncertainty. Thus, we think elevated market valuations and a see-saw political environment could be fueling interest here, along with the company's rising profitability. In sum, we suggest waiting for a better entry point. Nicholas P. Patrikis July 12, 2019													22.7 22.8		32.5 32.5		32.5 32.5		

YORK WATER NDQ-YORW				RECENT PRICE	35.34	P/E RATIO	32.1	(Trailing: 33.3 Median: 25.0)	RELATIVE P/E RATIO	1.88	DIV'D YLD	2.0%	VALUE LINE																	
TIMELINESS	3	Raised 1/25/19	High: 16.5	18.0	18.0	18.1	18.5	22.0	24.3	26.7	39.8	39.9	36.1	36.5	Target Price	Range														
SAFETY	3	Lowered 7/17/15	Low: 6.2	9.7	12.8	15.8	16.8	17.6	18.8	19.7	23.8	31.7	27.5	30.3	2022	2023	2024													
TECHNICAL	1	Raised 7/5/19	LEGENDS 1.10 x Dividends p sh divided by Interest Rate Relative Price Strength 3-for-2 split 9/06 Options: Yes Shaded area indicates recession																											
BETA	.75	(1.00 = Market)																												
2022-24 PROJECTIONS				Ann'l Total																										
High	Price	Gain	Return																											
Low	45	(+25%)	9%																											
	30	(-15%)	-1%																											
Insider Decisions				S O N D J F M A M																										
to Buy				2 14 2 3 14 2 2 16 2																										
Options				0 0 0 0 0 0 0 0 0 16																										
to Sell				0 0 0 0 0 0 0 0 0																										
Institutional Decisions				3Q2018 4Q2018 1Q2019																										
to Buy				42 43 33																										
to Sell				36 41 40																										
Hld's(000)				4539 4765 4794																										
				Percent shares traded	12																									
					4																									

Blue Granite Water Company
Summary of Risk Premium Models for the
Proxy Group of Six Water Companies

	<u>Proxy Group of Six Water Companies</u>
Predictive Risk Premium Model (PRPM) (1)	10.97 %
Risk Premium Using an Adjusted Total Market Approach (2)	<u>9.80 %</u>
Average	<u><u>10.39 %</u></u>

Notes:

(1) From page 2 of this Schedule.

(2) From page 3 of this Schedule.

Blue Granite Water Company
Indicated ROE
Derived by the Predictive Risk Premium Model (1)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Six Water Companies	LT Average Predicted Variance	Spot Predicted Variance	Recommended Variance (2)	GARCH Coefficient	Predicted Risk Premium (3)	Risk-Free Rate (4)	Indicated ROE (5)
American States Water Co.	0.38%	0.28%	0.33%	1.96484	8.00%	2.91%	10.91%
American Water Works Company Inc	NMF	NMF	NMF	6.41230	NMF	2.91%	NMF
Artesian Resources Corporation	0.33%	0.29%	0.31%	2.08636	8.01%	2.91%	10.92%
California Water Service Group	0.32%	0.26%	0.29%	2.03789	7.30%	2.91%	10.21%
Middlesex Water Co.	0.30%	0.26%	0.28%	2.16692	7.52%	2.91%	10.43%
York Water Co.	0.45%	0.31%	0.38%	2.06721	9.73%	2.91%	12.64%
						Average	11.02%
						Median	10.91%
						Average of Mean and Median	10.97%

NMF = Not Meaningful Figure

Notes:

- (1) The Predictive Risk Premium Model uses historical data to generate a predicted variance and a GARCH coefficient. The historical data used are the equity risk premiums for the first available trading month as reported by Bloomberg Professional Service.
- (2) Average of Columns [1] and [2].
- (3) $(1 + (\text{Column [3]} * \text{Column [4]})^{1/2}) - 1$.
- (4) From note 2 on page 2 of Schedule DWD-5.
- (5) Column [5] + Column [6].

Blue Granite Water Company
Indicated Common Equity Cost Rate
Through Use of a Risk Premium Model
Using an Adjusted Total Market Approach

<u>Line No.</u>		<u>Proxy Group of Six Water Companies</u>
1.	Prospective Yield on Aaa Rated Corporate Bonds (1)	3.90 %
2.	Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A Rated Public Utility Bonds	<u>0.37</u> (2)
3.	Adjusted Prospective Yield on A Rated Public Utility Bonds	4.27 %
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group	<u>0.08</u> (3)
5.	Adjusted Prospective Bond Yield	4.35 %
6.	Equity Risk Premium (4)	<u>5.45</u>
7.	Risk Premium Derived Common Equity Cost Rate	<u><u>9.80</u></u> %

- Notes:
- (1) Consensus forecast of Moody's Aaa Rated Corporate bonds from Blue Chip Financial Forecasts (see pages 10-11 of this Schedule).
 - (2) The average yield spread of A rated public utility bonds over Aaa rated corporate bonds of 0.37% from page 4 of this Schedule.
 - (3) Adjustment to reflect the A2 / A3 Moody's LT issuer rating of the Proxy Group of Six Water Companies as shown on page 5 of this Schedule. The 0.08% upward adjustment is derived by taking 1/6 of the spread between A2 and Baa2 Public Utility Bonds ($1/6 * 0.47\% = 0.08\%$) as derived from page 4 of this Schedule.
 - (4) From page 7 of this Schedule.

Blue Granite Water Company
Interest Rates and Bond Spreads for
Moody's Corporate and Public Utility Bonds

Selected Bond Yields

	[1]	[2]	[3]
	<u>Aaa Rated Corporate Bond</u>	<u>A Rated Public Utility Bond</u>	<u>Baa Rated Public Utility Bond</u>
Jul-2019	3.29 %	3.69 %	4.13 %
Jun-2019	3.42	3.82	4.31
May-2019	<u>3.67</u>	<u>3.98</u>	<u>4.47</u>
Average	<u><u>3.46 %</u></u>	<u><u>3.83 %</u></u>	<u><u>4.30 %</u></u>

Selected Bond Spreads

A Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:
0.37 % (1)

Baa Rated Public Utility Bonds Over A Rated Public Utility Bonds:
0.47 % (2)

Notes:

(1) Column [2] - Column [1].

(2) Column [3] - Column [2].

Source of Information:

Bloomberg Professional Service

Blue Granite Water Company
Comparison of Long-Term Issuer Ratings for
Proxy Group of Six Water Companies

	Moody's		Standard & Poor's	
	Long-Term Issuer Rating		Long-Term Issuer Rating	
	July 2019		July 2019	
<u>Proxy Group of Six Water Companies</u>	<u>Long-Term Issuer Rating</u>	<u>Numerical Weighting (1)</u>	<u>Long-Term Issuer Rating</u>	<u>Numerical Weighting(1)</u>
American States Water Co. (2)	A2	6.0	A+	5.0
American Water Works Company Inc (3)	A3	7.0	A	6.0
Artesian Resources Corporation	NR	--	NR	--
California Water Service Group (4)	NR	--	A+	5.0
Middlesex Water Co.	NR	--	A	6.0
York Water Co.	NR	--	A-	7.0
Average	<u>A2 / A3</u>	<u>6.5</u>	<u>A</u>	<u>5.8</u>

Notes:

- (1) From page 6 of this Schedule.
- (2) Ratings that of Golden State Water Company.
- (3) Ratings that of New Jersey and Pennsylvania American Water Companies.
- (4) Ratings that of California Water Service Company.

Source Information: Moody's Investors Service
Standard & Poor's Global Utilities Rating Service

Numerical Assignment for
Moody's and Standard & Poor's Bond Ratings

Moody's Bond Rating	Numerical Bond Weighting	Standard & Poor's Bond Rating
Aaa	1	AAA
Aa1	2	AA+
Aa2	3	AA
Aa3	4	AA-
A1	5	A+
A2	6	A
A3	7	A-
Baa1	8	BBB+
Baa2	9	BBB
Baa3	10	BBB-
Ba1	11	BB+
Ba2	12	BB
Ba3	13	BB-
B1	14	B+
B2	15	B
B3	16	B-

Blue Granite Water Company
Judgment of Equity Risk Premium for
Proxy Group of Six Water Companies

<u>Line No.</u>		<u>Proxy Group of Six Water Companies</u>
1.	Calculated equity risk premium based on the total market using the beta approach (1)	5.91 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A rated bonds (2)	<u>4.98</u>
3.	Average equity risk premium	<u><u>5.45 %</u></u>

Notes: (1) From page 8 of this Schedule.
(2) From page 12 of this Schedule.

Blue Granite Water Company
Derivation of Equity Risk Premium Based on the Total Market Approach
Using the Beta for the
Proxy Group of Six Water Companies

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Six Water Companies</u>
<u>Ibbotson-Based Equity Risk Premiums:</u>		
1.	Ibbotson Equity Risk Premium (1)	5.54 %
2.	Regression on Ibbotson Risk Premium Data (2)	8.35
3.	Ibbotson Equity Risk Premium based on PRPM (3)	9.05
4.	Equity Risk Premium Based on Value Line Summary and Index (4)	9.73
5.	Equity Risk Premium Based on Value Line S&P 500 Companies (5)	10.62
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>10.48</u>
7.	Conclusion of Equity Risk Premium	8.96 %
8.	Adjusted Beta (7)	<u>0.66</u>
9.	Forecasted Equity Risk Premium	<u><u>5.91</u></u> %

Notes provided on page 9 of this Schedule.

Blue Granite Water Company
Derivation of Equity Risk Premium Based on the Total Market Approach
Using the Beta for the
Proxy Group of Six Water Companies

Notes:

- (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® S&P® 2019 Market Report minus the arithmetic mean monthly yield of Moody's average Aaa and Aa corporate bonds from 1926-2018.
- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of large company common stocks relative to Moody's average Aaa and Aa rated corporate bond yields from 1928-2018 referenced in Note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is discussed in the accompanying direct testimony. The Ibbotson equity risk premium based on the PRPM is derived by applying the PRPM to the monthly risk premiums between Ibbotson large company common stock monthly returns and average Aaa and Aa corporate monthly bond yields, from January 1928 through July 2019.
- (4) The equity risk premium based on the Value Line Summary and Index is derived by subtracting the average consensus forecast of Aaa corporate bonds of 3.90% (from page 3 of this Schedule) from the projected 3-5 year total annual market return of 13.63% (described fully in note 1 on page 2 of Schedule DWD-5).
- (5) Using data from Value Line for the S&P 500, an expected total return of 14.52% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.90% results in an expected equity risk premium of 10.62%.
- (6) Using data from the Bloomberg Professional Service for the S&P 500, an expected total return of 14.38% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.90% results in an expected equity risk premium of 10.48%.
- (7) Average of mean and median beta from Schedule DWD-5.

Sources of Information:

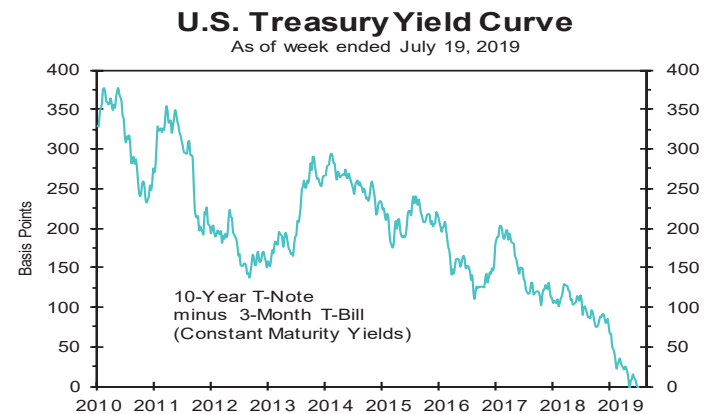
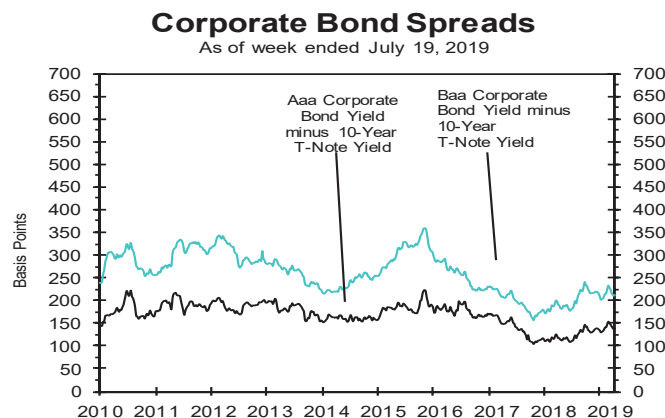
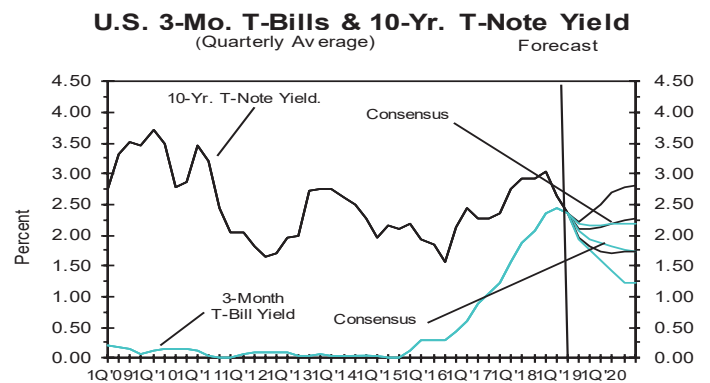
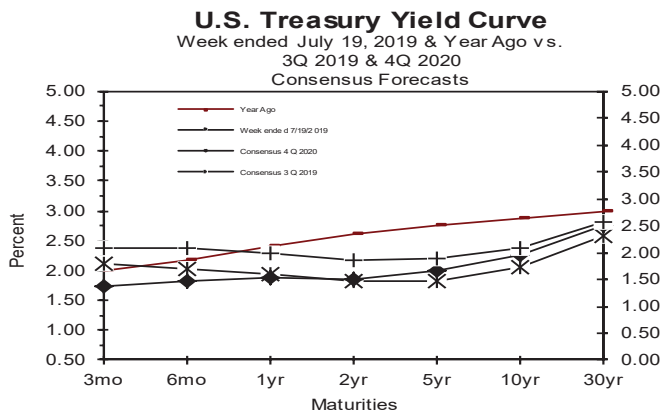
Stocks, Bonds, Bills, and Inflation - 2019 S&P Yearbook, John Wiley & Sons, Inc.
Industrial Manual and Mergent Bond Record Monthly Update.
Value Line Summary and Index
Blue Chip Financial Forecasts, August 1, 2019 and June 1, 2019
Bloomberg Professional Service

Consensus Forecasts of U.S. Interest Rates and Key Assumptions

Interest Rates	History								Consensus Forecasts-Quarterly Avg.					
	Average For Week Ending				Average For Month				3Q	4Q	1Q	2Q	3Q	4Q
	Jul 19	Jul 12	Jul 5	Jun 28	Jun	May	Apr	2Q 2019	2019	2019	2020	2020	2020	2020
Federal Funds Rate	2.39	2.41	2.40	2.38	2.38	2.39	2.42	2.40	2.2	2.0	1.9	1.8	1.8	1.8
Prime Rate	5.50	5.50	5.50	5.50	5.50	5.50	5.50	5.50	5.3	5.1	5.0	4.9	4.9	4.9
LIBOR, 3-mo.	2.29	2.33	2.31	2.32	2.40	2.53	2.59	2.51	2.3	2.2	2.1	2.1	2.0	2.0
Commercial Paper, 1-mo.	2.24	2.27	2.33	2.32	2.35	2.42	2.44	2.40	2.2	2.1	2.0	1.9	1.9	1.9
Treasury bill, 3-mo.	2.11	2.21	2.21	2.13	2.22	2.40	2.43	2.35	2.1	1.9	1.9	1.8	1.8	1.7
Treasury bill, 6-mo.	2.04	2.10	2.10	2.11	2.17	2.42	2.46	2.35	2.1	2.0	1.9	1.9	1.9	1.8
Treasury bill, 1 yr.	1.95	1.97	1.94	1.93	2.00	2.34	2.42	2.25	2.0	1.9	1.9	1.9	1.9	1.9
Treasury note, 2 yr.	1.82	1.86	1.80	1.74	1.81	2.21	2.34	2.12	1.8	1.8	1.8	1.8	1.9	1.9
Treasury note, 5 yr.	1.83	1.86	1.78	1.76	1.83	2.19	2.33	2.12	1.9	1.9	1.9	2.0	2.0	2.0
Treasury note, 10 yr.	2.07	2.09	2.00	2.02	2.07	2.40	2.53	2.33	2.1	2.1	2.1	2.2	2.2	2.3
Treasury note, 30 yr.	2.59	2.59	2.52	2.54	2.57	2.82	2.94	2.78	2.6	2.6	2.6	2.7	2.7	2.7
Corporate Aaa bond	3.46	3.46	3.40	3.46	3.56	3.79	3.87	3.74	3.4	3.5	3.6	3.7	3.8	3.8
Corporate Baa bond	4.19	4.19	4.13	4.19	4.33	4.53	4.61	4.49	4.4	4.5	4.6	4.7	4.8	4.8
State & Local bonds	3.23	3.25	3.27	3.27	3.29	3.38	3.49	3.39	3.3	3.3	3.3	3.4	3.4	3.5
Home mortgage rate	3.81	3.75	3.75	3.73	3.80	4.07	4.14	4.00	3.8	3.9	3.9	4.0	4.0	4.0

Key Assumptions	History								Consensus Forecasts-Quarterly					
	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q
	2017	2017	2018	2018	2018	2018	2019	2019	2019	2019	2020	2020	2020	2020
Fed's AFE \$ Index	105.5	106.2	102.9	105.5	107.8	109.4	109.4	110.2	109.2	109.2	108.2	108.0	107.7	107.4
Real GDP	3.2	3.5	2.5	3.5	2.9	1.1	3.1	2.1	1.9	1.9	1.8	1.8	1.8	1.9
GDP Price Index	2.4	2.6	2.3	3.2	2.0	1.6	1.1	2.4	2.0	2.0	2.0	2.1	2.1	2.0
Consumer Price Index	2.2	3.1	3.2	2.1	2.0	1.5	0.9	2.9	2.1	2.1	2.1	2.0	2.0	2.0

Forecasts for interest rates and the Federal Reserve's Major Currency Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index and Consumer Price Index are seasonally-adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data: Treasury rates from the Federal Reserve Board's H.15; AAA-AA and A-BBB corporate bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity; State and local bond yields from Bank of America-Merrill Lynch, A-rated, yield to maturity; Mortgage rates from Freddie Mac, 30-year, fixed; LIBOR quotes from Intercontinental Exchange. All interest rate data are sourced from Haver Analytics. Historical data for Fed's Major Currency Index are from FRSR H.10. Historical data for Real GDP and GDP Chained Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index (CPI) history is from the Department of Labor's Bureau of Labor Statistics (BLS).



Long-Range Survey:

The table below contains the results of our twice-annual long-range CONSENSUS survey. There are also Top 10 and Bottom 10 averages for each variable. Shown are consensus estimates for the years 2021 through 2025 and averages for the five-year periods 2021-2025 and 2026-2030. Apply these projections cautiously. Few if any economic, demographic and political forces can be evaluated accurately over such long time spans.

		Average For The Year					Five-Year Averages	
		2021	2022	2023	2024	2025	2021-2025	2026-2030
1. Federal Funds Rate	CONSENSUS	2.4	2.4	2.6	2.7	2.8	2.6	2.8
	Top 10 Average	3.1	3.2	3.4	3.4	3.4	3.3	3.4
	Bottom 10 Average	1.5	1.6	1.7	2.1	2.2	1.8	2.1
2. Prime Rate	CONSENSUS	5.4	5.5	5.6	5.8	5.8	5.6	5.7
	Top 10 Average	6.1	6.2	6.4	6.4	6.4	6.3	6.2
	Bottom 10 Average	4.6	4.7	4.8	5.1	5.3	4.9	5.1
3. LIBOR, 3-Mo.	CONSENSUS	2.7	2.8	2.8	3.0	3.0	2.9	3.0
	Top 10 Average	3.3	3.4	3.6	3.6	3.6	3.5	3.6
	Bottom 10 Average	2.1	2.1	2.0	2.4	2.5	2.2	2.5
4. Commercial Paper, 1-Mo.	CONSENSUS	2.5	2.6	2.7	2.9	2.9	2.7	2.9
	Top 10 Average	3.1	3.2	3.4	3.4	3.5	3.3	3.4
	Bottom 10 Average	2.0	2.0	2.0	2.4	2.4	2.2	2.4
5. Treasury Bill Yield, 3-Mo.	CONSENSUS	2.4	2.4	2.5	2.7	2.8	2.6	2.8
	Top 10 Average	3.1	3.2	3.4	3.4	3.4	3.3	3.4
	Bottom 10 Average	1.5	1.6	1.7	2.0	2.2	1.8	2.1
6. Treasury Bill Yield, 6-Mo.	CONSENSUS	2.4	2.5	2.7	2.9	2.9	2.7	2.9
	Top 10 Average	3.1	3.3	3.5	3.5	3.5	3.4	3.5
	Bottom 10 Average	1.7	1.7	1.8	2.2	2.4	2.0	2.3
7. Treasury Bill Yield, 1-Yr.	CONSENSUS	2.5	2.6	2.8	3.0	3.0	2.8	3.0
	Top 10 Average	3.3	3.4	3.6	3.6	3.7	3.5	3.7
	Bottom 10 Average	1.8	1.8	2.0	2.3	2.4	2.0	2.3
8. Treasury Note Yield, 2-Yr.	CONSENSUS	2.6	2.7	2.9	3.0	3.1	2.9	3.1
	Top 10 Average	3.3	3.5	3.7	3.8	3.8	3.6	3.8
	Bottom 10 Average	1.8	1.9	2.0	2.3	2.4	2.1	2.3
10. Treasury Note Yield, 5-Yr.	CONSENSUS	2.8	2.9	3.1	3.2	3.3	3.0	3.3
	Top 10 Average	3.5	3.7	4.0	4.0	4.0	3.8	4.1
	Bottom 10 Average	2.0	2.1	2.2	2.3	2.5	2.2	2.4
11. Treasury Note Yield, 10-Yr.	CONSENSUS	3.0	3.1	3.3	3.3	3.4	3.2	3.4
	Top 10 Average	3.6	3.9	4.2	4.2	4.2	4.0	4.4
	Bottom 10 Average	2.3	2.4	2.4	2.5	2.6	2.4	2.6
12. Treasury Bond Yield, 30-Yr.	CONSENSUS	3.3	3.5	3.6	3.7	3.8	3.6	3.8
	Top 10 Average	4.0	4.3	4.5	4.6	4.6	4.4	4.8
	Bottom 10 Average	2.7	2.7	2.8	2.9	2.9	2.8	2.9
13. Corporate Aaa Bond Yield	CONSENSUS	4.4	4.6	4.7	4.7	4.8	4.6	4.8
	Top 10 Average	5.0	5.2	5.5	5.5	5.5	5.3	5.6
	Bottom 10 Average	3.8	3.9	3.9	4.0	4.0	3.9	4.0
13. Corporate Baa Bond Yield	CONSENSUS	5.3	5.6	5.7	5.7	5.7	5.6	5.8
	Top 10 Average	6.0	6.3	6.6	6.6	6.7	6.5	6.8
	Bottom 10 Average	4.7	4.8	4.7	4.8	4.8	4.7	4.8
14. State & Local Bonds Yield	CONSENSUS	4.1	4.2	4.3	4.3	4.3	4.2	4.4
	Top 10 Average	4.6	4.9	5.0	5.0	5.0	4.9	5.1
	Bottom 10 Average	3.5	3.6	3.6	3.6	3.6	3.6	3.6
15. Home Mortgage Rate	CONSENSUS	4.7	4.8	4.9	5.0	5.0	4.9	5.0
	Top 10 Average	5.3	5.5	5.8	5.8	5.8	5.6	5.9
	Bottom 10 Average	4.0	4.0	4.0	4.2	4.2	4.1	4.2
A. Fed's AFE Nominal \$ Index	CONSENSUS	108.5	108.2	108.0	107.6	106.9	107.8	106.7
	Top 10 Average	110.8	110.5	110.9	110.8	110.6	110.7	111.2
	Bottom 10 Average	106.6	105.8	104.9	104.6	103.6	105.1	102.9
		Year-Over-Year, % Change					Five-Year Averages	
		2021	2022	2023	2024	2025	2021-2025	2026-2030
B. Real GDP	CONSENSUS	1.9	1.9	2.0	2.1	2.1	2.0	2.1
	Top 10 Average	2.3	2.4	2.4	2.5	2.5	2.4	2.6
	Bottom 10 Average	1.5	1.4	1.6	1.8	1.8	1.6	1.8
C. GDP Chained Price Index	CONSENSUS	2.1	2.1	2.0	2.0	2.0	2.1	2.0
	Top 10 Average	2.4	2.4	2.2	2.2	2.2	2.3	2.2
	Bottom 10 Average	1.8	1.8	1.8	1.9	1.9	1.9	1.8
D. Consumer Price Index	CONSENSUS	2.1	2.2	2.2	2.1	2.1	2.1	2.1
	Top 10 Average	2.5	2.4	2.4	2.4	2.4	2.4	2.4
	Bottom 10 Average	1.7	1.8	1.9	1.9	1.9	1.8	1.8

Blue Granite Water Company
Derivation of Mean Equity Risk Premium Based Studies
Using Holding Period Returns and
Projected Market Appreciation of the S&P Utility Index

<u>Line No.</u>		<u>Implied Equity Risk Premium</u>
	<u>Equity Risk Premium based on S&P Utility Index Holding Period Returns (1):</u>	
1.	Historical Equity Risk Premium	4.00 %
2.	Regression of Historical Equity Risk Premium (2)	6.04
3.	Forecasted Equity Risk Premium Based on PRPM (3)	3.77
4.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Value Line Data) (4)	6.24
5.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Bloomberg Data) (5)	<u>4.83</u>
6.	Average Equity Risk Premium (6)	<u><u>4.98 %</u></u>

- Notes: (1) Based on S&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1928-2018. Holding period returns are calculated based upon income received (dividends and interest) plus the relative change in the market value of a security over a one-year holding period.
- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of the S&P Utility Index relative to Moody's A rated public utility bond yields from 1928 - 2018 referenced in note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is applied to the risk premium of the monthly total returns of the S&P Utility Index and the monthly yields on Moody's A rated public utility bonds from January 1928 - July 2019.
- (4) Using data from Value Line for the S&P Utilities Index, an expected return of 10.51% was derived based on expected dividend yields and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A rated public utility bond yield of 4.27%, calculated on line 3 of page 3 of this Schedule results in an equity risk premium of 6.24%. $(10.51\% - 4.27\% = 6.24\%)$
- (5) Using data from Bloomberg Professional Service for the S&P Utilities Index, an expected return of 9.10% was derived based on expected dividend yields and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A rated public utility bond yield of 4.27%, calculated on line 3 of page 3 of this Schedule results in an equity risk premium of 4.83%. $(9.10\% - 4.27\% = 4.83\%)$
- (6) Average of lines 1 through 5.

Blue Granite Water Company
Indicated Common Equity Cost Rate Through Use
of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

Proxy Group of Six Water Companies	[1] Value Line Adjusted Beta	[2] Bloomberg Adjusted Beta	[3] Average Beta	[4] Market Risk Premium (1)	[5] Risk-Free Rate (2)	[6] Traditional CAPM Cost Rate	[7] ECAPM Cost Rate	[8] Indicated Common Equity Cost Rate (3)
American States Water Co.	0.70	0.55	0.63	10.03 %	2.91 %	9.23 %	10.16 %	9.69 %
American Water Works Company Inc	0.60	0.59	0.60	10.03	2.91	8.93	9.93	9.43
Artesian Resources Corporation	0.65	0.58	0.62	10.03	2.91	9.13	10.08	9.61
California Water Service Group	0.70	0.64	0.67	10.03	2.91	9.63	10.46	10.05
Middlesex Water Co.	0.75	0.70	0.73	10.03	2.91	10.23	10.91	10.57
York Water Co.	0.75	0.64	0.70	10.03	2.91	9.93	10.68	10.31
Mean		0.66	0.66			9.51 %	10.37 %	9.94 %
Median			0.65			9.43 %	10.31 %	9.87 %
Average of Mean and Median			0.66			9.47	10.34	9.91 %

Notes on page 2 of this Schedule.

Blue Granite Water Company
Notes to Accompany the Application of the CAPM and ECAPM

Notes:

- (1) The market risk premium (MRP) is derived by using six different measures from three sources: Ibbotson, Value Line, and Bloomberg as illustrated below:

Historical Data MRP Estimates:

Measure 1: Ibbotson Arithmetic Mean MRP (1926-2018)

Arithmetic Mean Monthly Returns for Large Stocks 1926-2018:	11.89 %
Arithmetic Mean Income Returns on Long-Term Government Bonds:	<u>5.12</u>
MRP based on Ibbotson Historical Data:	<u>6.77 %</u>

Measure 2: Application of a Regression Analysis to Ibbotson Historical Data (1926-2018)

9.42 %

Measure 3: Application of the PRPM to Ibbotson Historical Data:
(January 1926 - July 2019)

10.20 %

Value Line MRP Estimates:

Measure 4: Value Line Projected MRP (Thirteen weeks ending August 02, 2019)

Total projected return on the market 3-5 years hence*:	13.63 %
Projected Risk-Free Rate (see note 2):	<u>2.91</u>
MRP based on Value Line Summary & Index:	<u>10.72 %</u>
*Forecasted 3-5 year capital appreciation plus expected dividend yield	

Measure 5: Value Line Projected Return on the Market based on the S&P 500

Total return on the Market based on the S&P 500:	14.52 %
Projected Risk-Free Rate (see note 2):	<u>2.91</u>
MRP based on Value Line data	<u>11.61 %</u>

Measure 6: Bloomberg Projected MRP

Total return on the Market based on the S&P 500:	14.38 %
Projected Risk-Free Rate (see note 2):	<u>2.91</u>
MRP based on Bloomberg data	<u>11.47 %</u>

Average of Value Line, Ibbotson, and Bloomberg MRP: 10.03 %

- (2) For reasons explained in the direct testimony, the appropriate risk-free rate for cost of capital purposes is the average forecast of 30 year Treasury Bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts. (See pages 10-11 of Schedule DWD-4.) The projection of the risk-free rate is illustrated below:

Third Quarter 2019	2.60 %
Fourth Quarter 2019	2.60
First Quarter 2020	2.60
Second Quarter 2020	2.70
Third Quarter 2020	2.70
Fourth Quarter 2020	2.70
2021-2025	3.60
2026-2030	<u>3.80</u>
	<u>2.91 %</u>

- (3) Average of Column 6 and Column 7.

Sources of Information:

Value Line Summary and Index
Blue Chip Financial Forecasts, August 1, 2019 and June 1, 2019
Stocks, Bonds, Bills, and Inflation - 2019 SBBI Yearbook, John Wiley & Sons, Inc.
Bloomberg Professional Services

Blue Granite Water Company
Basis of Selection of the Group of Non-Price Regulated Companies
Comparable in Total Risk to the Utility Proxy Group

The criteria for selection of the Non-Price Regulated Proxy Group was that the non-price regulated companies be domestic and reported in Value Line Investment Survey (Standard Edition).

The Non-Price Regulated Proxy Group was then selected based on the unadjusted beta range of 0.26 – 0.70 and residual standard error of the regression range of 2.7407 – 3.2687 of the Utility Proxy Group.

These ranges are based upon plus or minus two standard deviations of the unadjusted beta and standard error of the regression. Plus or minus two standard deviations captures 95.50% of the distribution of unadjusted betas and residual standard errors of the regression.

The standard deviation of the Utility Proxy Group's residual standard error of the regression is 0.1320. The standard deviation of the standard error of the regression is calculated as follows:

$$\text{Standard Deviation of the Std. Err. of the Regr.} = \frac{\text{Standard Error of the Regression}}{\sqrt{2N}}$$

where: N = number of observations. Since Value Line betas are derived from weekly price change observations over a period of five years, N = 259

$$\text{Thus, } 0.1320 = \frac{3.0047}{\sqrt{518}} = \frac{3.0047}{22.7596}$$

Source of Information: Value Line, Inc., June 2019
Value Line Investment Survey (Standard Edition)

Blue Granite Water Company
Basis of Selection of Comparable Risk
Domestic Non-Price Regulated Companies

	[1]	[2]	[3]	[4]
	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
<u>Proxy Group of Six Water Companies</u>				
American States Water Co.	0.70	0.48	2.7300	0.0984
American Water Works Company Inc	0.60	0.36	2.1647	0.0780
Artesian Resources Corporation	0.65	0.41	3.4190	0.1232
California Water Service Group	0.70	0.49	2.9531	0.1064
Middlesex Water Co.	0.75	0.56	3.2871	0.1185
York Water Co.	0.75	0.58	3.4742	0.1252
Average	<u>0.69</u>	<u>0.48</u>	<u>3.0047</u>	<u>0.1083</u>
Beta Range (+/- 2 std. Devs. of Beta)	0.26	0.70		
2 std. Devs. of Beta	0.22			
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.7407	3.2687		
Std. dev. of the Res. Std. Err.	0.1320			
2 std. devs. of the Res. Std. Err.	0.2640			

Source of Information: Valueline Proprietary Database, June 2019

Blue Granite Water Company
Proxy Group of Non-Price Regulated Companies
Comparable in Total Risk to the
Proxy Group of Six Water Companies

	[1]	[2]	[3]	[4]
Proxy Group of Fourteen Non-Price Regulated Companies	VL Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
AutoZone Inc.	0.75	0.62	2.8572	0.1030
Cheesecake Factory	0.70	0.54	2.8398	0.1023
Casey's Gen'l Stores	0.75	0.57	3.0277	0.1091
Cboe Global Markets	0.70	0.52	2.7792	0.1001
Cracker Barrel	0.70	0.53	3.0130	0.1086
Campbell Soup	0.65	0.46	2.8442	0.1025
Dollar General	0.80	0.66	3.0238	0.1090
Dunkin' Brands Group	0.65	0.46	2.8236	0.1018
Darden Restaurants	0.80	0.64	2.9600	0.1067
Integra LifeSciences	0.80	0.66	3.1779	0.1145
Jack in the Box	0.80	0.67	3.2293	0.1164
Philip Morris Int'l	0.85	0.70	2.7477	0.0990
Texas Roadhouse	0.85	0.70	3.0559	0.1101
Viad Corp.	0.80	0.68	3.0745	0.1108
Average	0.76	0.60	2.9600	0.1100
Proxy Group of Six Water Companies	0.69	0.48	3.0047	0.1083

Source of Information:

Valueline Proprietary Database, June 2019

Blue Granite Water Company
Summary of Cost of Equity Models Applied to
Proxy Group of Fourteen Non-Price Regulated Companies
Comparable in Total Risk to the
Proxy Group of Six Water Companies

<u>Principal Methods</u>	<u>Proxy Group of Fourteen Non- Price Regulated Companies</u>
Discounted Cash Flow Model (DCF) (1)	12.14 %
Risk Premium Model (RPM) (2)	11.60
Capital Asset Pricing Model (CAPM) (3)	<u>10.84</u>
Mean	<u><u>11.53</u></u> %
Median	<u><u>11.60</u></u> %
Average of Mean and Median	<u><u>11.57</u></u> %

Notes:

- (1) From page 2 of this Schedule.
- (2) From page 3 of this Schedule.
- (3) From page 6 of this Schedule.

Blue Granite Water Company
DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the
Proxy Group of Six Water Companies

[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Fourteen Non-Price Regulated Companies	Value Line Projected Five Year Growth in EPS	Reuters Mean Consensus Projected Five Year Growth Rate in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS	Adjusted Dividend Yield	Indicated Common Equity Cost Rate (1)
	Average Dividend Yield						
AutoZone Inc.	- %	11.80 %	12.20 %	11.80 %	12.33 %	- %	NA %
Cheesecake Factory	3.21	11.45	13.00	11.45	10.85	3.38	14.23
Casey's Gen'l Stores	0.87	7.95	9.40	7.95	7.70	0.90	8.60
Cboe Global Markets	1.33	2.09	9.00	2.08	6.92	1.38	8.30
Cracker Barrel	3.08	(0.40)	10.00	(0.40)	10.00	3.23	13.23
Campbell Soup	3.48	(3.27)	5.00	(3.27)	3.00	3.53	6.53
Dollar General	0.97	9.84	10.90	9.84	10.65	1.02	11.67
Dunkin' Brands Group	1.91	7.45	10.80	7.45	8.93	2.00	10.93
Darden Restaurants	2.90	10.53	10.10	10.53	10.79	3.06	13.85
Integra LifeSciences	-	12.07	11.70	12.07	14.46	-	NA
Jack in the Box	1.99	12.47	13.00	12.47	11.86	2.11	13.97
Philip Morris Int'l	5.59	5.71	7.90	5.71	6.33	5.77	12.10
Texas Roadhouse	2.22	9.80	11.30	9.15	10.94	2.34	13.28
Viad Corp.	0.61	NA	NA	14.00	12.50	0.65	13.15
						Mean	11.65 %
						Median	12.63 %
						Average of Mean and Median	12.14 %

NA= Not Available
NMF= Not Meaningful Figure

(1) The application of the DCF model to the domestic, non-price regulated comparable risk companies is identical to the application of the DCF to the utility proxy group. The dividend yield is derived by using the 60 day average price and the spot indicated dividend as of July 31, 2019. The dividend yield is then adjusted by 1/2 the average projected growth rate in EPS, which is calculated by averaging the 5 year projected growth in EPS provided by Value Line, www.reuters.com, www.zacks.com, and www.yahoo.com (excluding any negative growth rates) and then adding that growth rate to the adjusted dividend yield.

Source of Information:
Value Line Investment Survey
www.reuters.com Downloaded on 07/31/2019
www.zacks.com Downloaded on 07/31/2019
www.yahoo.com Downloaded on 07/31/2019

Blue Granite Water Company
Indicated Common Equity Cost Rate
Through Use of a Risk Premium Model
Using an Adjusted Total Market Approach

<u>Line No.</u>		<u>Proxy Group of Fourteen Non-Price Regulated Companies</u>
1.	Prospective Yield on Baa Rated Corporate Bonds (1)	4.90 %
2.	Adjustment to Reflect Bond rating Difference of Non-Price Regulated Companies (2)	<u>(0.20)</u>
3.	Adjusted Prospective Bond Yield	4.70
4.	Equity Risk Premium (3)	<u>6.90</u>
4.	Risk Premium Derived Common Equity Cost Rate	<u><u>11.60 %</u></u>

Notes: (1) Average forecast of Baa corporate bonds based upon the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated August 1, 2019 and June 1, 2019 (see pages 10 and 11 of Schedule DWD-4). The estimates are detailed below.

Third Quarter 2019	4.40 %
Fourth Quarter 2019	4.50
First Quarter 2020	4.60
Second Quarter 2020	4.70
Third Quarter 2020	4.80
Fourth Quarter 2020	4.80
2021-2025	5.60
2026-2030	<u>5.80</u>
Average	<u><u>4.90 %</u></u>

(2) To reflect the Baa1 average rating of the non-utility proxy group, the prospective yield on Baa corporate bonds must be adjusted downward by 1/3 of the spread between A and Baa corporate bond yields as shown below:

	A Corp. Bond Yield		Baa Corp. Bond Yield		Spread
Jul-2019	3.70 %		4.28 %		0.58 %
Jun-2019	3.83		4.46		0.63
May-2019	4.01		4.63		<u>0.62</u>
	Average yield spread 1/3 of spread				<u>0.61 %</u>
					<u><u>0.20 %</u></u>

(3) From page 5 of this Schedule.

Blue Granite Water Company
Comparison of Long-Term Issuer Ratings for the
Proxy Group of Fourteen Non-Price Regulated Companies of Comparable risk to the
Proxy Group of Six Water Companies

Proxy Group of Fourteen Non- Price Regulated Companies	Moody's Long-Term Issuer Rating July 2019		Standard & Poor's Long-Term Issuer Rating July 2019	
	Long-Term Issuer Rating	Numerical Weighting (1)	Long-Term Issuer Rating	Numerical Weighting (1)
AutoZone Inc.	Baa1	8.0	BBB	9.0
Cheesecake Factory	NR	--	NR	--
Casey's Gen'l Stores	NR	--	NR	--
Cboe Global Markets	A3	7.0	A-	7.0
Cracker Barrel	WR	--	NR	--
Campbell Soup	Baa2	9.0	BBB-	10.0
Dollar General	Baa2	9.0	BBB	9.0
Dunkin' Brands Group	NR	--	NR	--
Darden Restaurants	Baa2	9.0	BBB	9.0
Integra LifeSciences	NR	--	NR	--
Jack in the Box	WR	--	NR	--
Philip Morris Int'l	A2	6.0	A	6.0
Texas Roadhouse	NR	--	NR	--
Viad Corp.	WR	--	NR	--
Average	<u>Baa1</u>	<u>8.0</u>	<u>BBB+</u>	<u>8.3</u>

Notes:

(1) From page 6 of Schedule DWD-4.

Source of Information:

Bloomberg Professional Services

Blue Granite Water Company
Derivation of Equity Risk Premium Based on the Total Market Approach
Using the Beta for
Proxy Group of Fourteen Non-Price Regulated Companies of Comparable risk to the
Proxy Group of Six Water Companies

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Fourteen Non-Price Regulated Companies</u>
<u>Ibbotson-Based Equity Risk Premiums:</u>		
1.	Ibbotson Equity Risk Premium (1)	5.54 %
2.	Regression on Ibbotson Risk Premium Data (2)	8.35
3.	Ibbotson Equity Risk Premium based on PRPM (3)	9.05
5.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (4)	9.73
6.	Equity Risk Premium Based on <u>Value Line</u> S&P 500 Companies (5)	10.62
8.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>10.48</u>
9.	Conclusion of Equity Risk Premium	8.96 %
10.	Adjusted Beta (7)	<u>0.77</u>
11.	Forecasted Equity Risk Premium	<u><u>6.90 %</u></u>

Notes:

- (1) From note 1 of page 9 of Schedule DWD-4.
- (2) From note 2 of page 9 of Schedule DWD-4.
- (3) From note 3 of page 9 of Schedule DWD-4.
- (4) From note 4 of page 9 of Schedule DWD-4.
- (5) From note 5 of page 9 of Schedule DWD-4.
- (6) From note 6 of page 9 of Schedule DWD-4.
- (7) Average of mean and median beta from page 6 of this Schedule.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2019 SBBI Yearbook, John Wiley & Sons, Inc.
Value Line Summary and Index
Blue Chip Financial Forecasts, August 1, 2019 and June 1, 2019
Bloomberg Professional Services

Blue Granite Water Company
Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the
Proxy Group of Six Water Companies

Proxy Group of Fourteen Non-Price Regulated Companies	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
	Value Line Adjusted Beta	Bloomberg Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
AutoZone Inc.	0.75	0.66	0.70	10.03 %	2.91 %	9.93 %	10.68 %	10.31 %
Cheesecake Factory	0.70	0.74	0.72	10.03	2.91	10.13	10.84	10.48
Casey's Gen'l Stores	0.75	0.79	0.77	10.03	2.91	10.63	11.21	10.92
Cboe Global Markets	0.70	0.78	0.74	10.03	2.91	10.33	10.99	10.66
Cracker Barrel	0.70	0.73	0.72	10.03	2.91	10.13	10.84	10.48
Campbell Soup	0.65	0.60	0.63	10.03	2.91	9.23	10.16	9.69
Dollar General	0.80	0.72	0.76	10.03	2.91	10.53	11.14	10.84
Dunkin' Brands Group	0.65	0.85	0.75	10.03	2.91	10.43	11.06	10.75
Darden Restaurants	0.80	0.79	0.79	10.03	2.91	10.84	11.36	11.10
Integra LifeSciences	0.80	0.90	0.85	10.03	2.91	11.44	11.81	11.63
Jack in the Box	0.80	0.67	0.73	10.03	2.91	10.23	10.91	10.57
Philip Morris Int'l	0.85	0.94	0.90	10.03	2.91	11.94	12.19	12.06
Texas Roadhouse	0.85	0.82	0.84	10.03	2.91	11.34	11.74	11.54
Viad Corp.	0.80	0.83	0.81	10.03	2.91	11.04	11.51	11.27
Mean			<u>0.77</u>			<u>10.58 %</u>	<u>11.17 %</u>	<u>10.88 %</u>
Median			<u>0.76</u>			<u>10.48 %</u>	<u>11.10 %</u>	<u>10.80 %</u>
Average of Mean and Median			<u>0.77</u>			<u>10.53 %</u>	<u>11.14 %</u>	<u>10.84 %</u>

Notes:
(1) From Schedule DWD-5, note 1.
(2) From Schedule DWD-5, note 2.
(3) Average of CAPM and ECAPM cost rates.

Blue Granite Water Company
Derivation of Investment Risk Adjustment Based upon
Ibbotson Associates' Size Premia for the Decile Portfolios of the NYSE/AMEX/NASDAQ

Line No.	[1]		[2]		[3]		[4]	
	Market Capitalization on April 30, 2019 (1) (millions)	(times larger)	Applicable Decile of the NYSE/AMEX/ NASDAQ (2)		Applicable Size Premium (3)		Spread from Applicable Size Premium (4)	
1.	Blue Granite Water Company	\$ 59,825	10		5.22%			
2.	Proxy Group of Six Water Companies	\$ 4,663,072	77.9 x	4	0.85%		4.37%	
			[A]	[B]	[C]		[D]	
			Decile	Market Capitalization of Smallest Company (millions)	Market Capitalization of Largest Company (millions)		Size Premium (Return in Excess of CAPM)*	
	Largest		1	\$ 29,428,909	\$ 1,073,390,566		-0.30%	
			2	13,512,960	29,022,867		0.52%	
			3	7,275,967	13,455,802		0.81%	
			4	4,504,066	7,524,230		0.85%	
			5	2,996,003	4,503,549		1.28%	
			6	1,961,831	2,992,251		1.50%	
			7	1,292,791	1,960,201		1.58%	
			8	730,047	1,292,224		1.80%	
			9	325,360	727,843		2.46%	
	Smallest		10	2455	321,578		5.22%	
				*From 2019 Duff & Phelps Cost of Capital Navigator				

Notes:

- (1) From page 2 of this Schedule.
- (2) Gleaned from Columns [B] and [C] on the bottom of this page. The appropriate decile (Column [A]) corresponds to the market capitalization of the proxy group, which is found in Column [1].
- (3) Corresponding risk premium to the decile is provided in Column [D] on the bottom of this page.
- (4) Line No. 1 Column [3] - Line No. 2 Column [3]. For example, the 4.37% in Column [4], Line No. 2 is derived as follows 4.37% = 5.22% - 0.85%.

Blue Granite Water Company
Market Capitalization of Blue Granite Water Company and the
Proxy Group of Six Water Companies

Company	Exchange	(1) Common Stock Shares Outstanding at Fiscal Year End 2018 (millions)	(2) Book Value per Share at Fiscal Year End 2018 (1)	(3) Total Common Equity at Fiscal Year End 2018 (millions)	(4) Closing Stock Market Price on July 31, 2019	(5) Market-to- Book Ratio on July 31, 2019 (2)	(6) Market Capitalization on July 31, 2019 (3) (millions)
Blue Granite Water Company		NA	NA	16,208	NA		
Based upon Proxy Group of Six Water Companies						369.1	\$ 59,825
Proxy Group of Six Water Companies							
American States Water Co.	NYSE	36,758	\$ 15,187	\$ 558,223	\$ 77,470	510.1 %	\$ 2,847,630
American Water Works Company Inc	NYSE	180,684	32,454	5,964,000	114,780	353.7	20,738,910
Artesian Resources Corporation	NYSE	9,250	16,568	153,251	35,980	217.2	332,815
California Water Service Group	NYSE	48,065	15,191	730,157	53,390	351.5	2,566,175
Middlesex Water Co.	NYSE	16,403	15,167	248,787	62,630	412.9	1,027,320
York Water Co.	NYSE	12,944	9,750	126,195	35,970	368.9	465,579
Average		50,684	\$ 17,386	\$ 1,280,102	\$ 63,370	369.1 %	\$ 4,663,072

NA= Not Available

Notes: (1) Column 3 / Column 1.

(2) Column 4 / Column 2.

(3) Column 1 * Column 4.

(4) Total book equity multiplied by requested equity ratio.

(5) The market-to-book ratio of Blue Granite Water Company on July 31, 2019 is assumed to be equal to the market-to-book ratio of Proxy Group of Six Water Companies on July 31, 2019 as appropriate.

(6) Column [3] multiplied by Column [5].

Source of Information: 2018 Annual Forms 10K
yahooofinance.com

Blue Granite Water Company
Portfolio Ranks by Size and Risk Premiums over CAPM Results
as Compiled by Duff and Phelps 2019 Guide to Cost of Capital

Portfolio Rank by Size	B-1		B-2		B-4		B-5		B-7		B-8	
	Market Val. of Equity (in \$millions)	Smootherd Premium over CAPM	Average Book Val. (in \$millions)	Smootherd Premium over CAPM	Market Value of Invested Capital (in \$millions)	Smootherd Premium over CAPM	Total Assets (in \$millions)	Smootherd Premium over CAPM	Sales (in \$millions)	Smootherd Premium over CAPM	Average Number of Employees	Smootherd Premium over CAPM
1	\$183,530 and Up	-1.58%	\$39,064 and Up	0.70%	\$218,547 and Up	-0.91%	\$118,454 and Up	0.42%	\$83,836 and Up	0.66%	224,700 and Up	0.32%
2	\$58,770 - \$183,530	-0.17%	\$14,329 - \$39,064	1.38%	\$76,098 - \$218,547	0.17%	\$49,025 - \$118,454	1.13%	\$30,694 - \$83,836	1.41%	87,395 - 224,700	1.17%
3	\$36,102 - \$58,770	0.39%	\$9,398 - \$14,329	1.63%	\$46,827 - \$76,098	0.65%	\$32,779 - \$49,025	1.40%	\$18,880 - \$30,694	1.81%	58,282 - 87,395	1.52%
4	\$25,511 - \$36,102	0.79%	\$6,536 - \$9,398	1.83%	\$33,869 - \$46,827	0.97%	\$22,606 - \$32,779	1.65%	\$14,299 - \$18,880	1.99%	44,136 - 58,282	1.75%
5	\$19,083 - \$25,511	1.08%	\$4,972 - \$6,536	2.02%	\$25,989 - \$33,869	1.19%	\$16,793 - \$22,606	1.87%	\$11,160 - \$14,299	2.17%	34,651 - 44,136	1.92%
6	\$14,850 - \$19,083	1.39%	\$4,216 - \$4,972	2.12%	\$20,123 - \$25,989	1.43%	\$13,244 - \$16,793	2.02%	\$9,136 - \$11,160	2.31%	27,046 - 34,651	2.10%
7	\$12,298 - \$14,850	1.58%	\$3,539 - \$4,216	2.20%	\$16,237 - \$20,123	1.62%	\$10,530 - \$13,244	2.18%	\$7,727 - \$9,136	2.43%	21,476 - 27,046	2.29%
8	\$10,226 - \$12,298	1.78%	\$2,887 - \$3,539	2.32%	\$13,373 - \$16,237	1.80%	\$8,750 - \$10,530	2.31%	\$6,699 - \$7,727	2.52%	17,789 - 21,476	2.44%
9	\$8,627 - \$10,226	1.96%	\$2,403 - \$2,887	2.42%	\$11,285 - \$13,373	1.96%	\$7,383 - \$8,750	2.42%	\$5,696 - \$6,699	2.61%	15,100 - 17,789	2.57%
10	\$7,351 - \$8,627	2.12%	\$2,055 - \$2,403	2.52%	\$9,706 - \$11,285	2.09%	\$6,290 - \$7,383	2.53%	\$4,671 - \$5,696	2.73%	13,149 - 15,100	2.68%
11	\$6,241 - \$7,351	2.29%	\$1,799 - \$2,055	2.59%	\$8,264 - \$9,706	2.21%	\$5,360 - \$6,290	2.62%	\$3,861 - \$4,671	2.87%	11,535 - 13,149	2.77%
12	\$5,361 - \$6,241	2.46%	\$1,588 - \$1,799	2.66%	\$6,974 - \$8,264	2.37%	\$4,546 - \$5,360	2.73%	\$3,312 - \$3,861	2.97%	10,137 - 11,535	2.87%
13	\$4,586 - \$5,361	2.60%	\$1,400 - \$1,588	2.73%	\$6,030 - \$6,974	2.50%	\$3,885 - \$4,546	2.83%	\$2,867 - \$3,312	3.07%	8,921 - 10,137	2.96%
14	\$3,853 - \$4,586	2.79%	\$1,230 - \$1,400	2.80%	\$5,227 - \$6,030	2.61%	\$3,273 - \$3,885	2.93%	\$2,506 - \$2,867	3.16%	7,763 - 8,921	3.06%
15	\$3,319 - \$3,853	2.95%	\$1,069 - \$1,230	2.87%	\$4,488 - \$5,227	2.75%	\$2,780 - \$3,273	3.05%	\$2,209 - \$2,506	3.24%	6,656 - 7,763	3.16%
16	\$2,915 - \$3,319	3.09%	\$930 - \$1,069	2.95%	\$3,887 - \$4,488	2.87%	\$2,423 - \$2,780	3.14%	\$1,944 - \$2,209	3.32%	5,574 - 6,656	3.29%
17	\$2,530 - \$2,915	3.22%	\$811 - \$930	3.02%	\$3,305 - \$3,887	3.00%	\$2,092 - \$2,423	3.23%	\$1,723 - \$1,944	3.41%	4,653 - 5,574	3.42%
18	\$2,120 - \$2,530	3.38%	\$686 - \$811	3.10%	\$2,707 - \$3,305	3.16%	\$1,750 - \$2,092	3.33%	\$1,526 - \$1,723	3.48%	3,852 - 4,653	3.56%
19	\$1,713 - \$2,120	3.59%	\$574 - \$686	3.20%	\$2,178 - \$2,707	3.35%	\$1,441 - \$1,750	3.46%	\$1,278 - \$1,526	3.56%	3,145 - 3,852	3.70%
20	\$1,379 - \$1,713	3.82%	\$483 - \$574	3.30%	\$1,794 - \$2,178	3.53%	\$1,184 - \$1,441	3.58%	\$1,007 - \$1,278	3.71%	2,529 - 3,145	3.86%
21	\$1,112 - \$1,379	4.03%	\$404 - \$483	3.39%	\$1,453 - \$1,794	3.68%	\$934 - \$1,184	3.72%	\$797 - \$1,007	3.87%	1,986 - 2,529	4.02%
22	\$867 - \$1,112	4.27%	\$331 - \$404	3.49%	\$1,118 - \$1,453	3.90%	\$708 - \$934	3.89%	\$626 - \$797	4.01%	1,495 - 1,986	4.21%
23	\$633 - \$867	4.54%	\$256 - \$331	3.61%	\$807 - \$1,118	4.13%	\$512 - \$708	4.07%	\$460 - \$626	4.19%	1,079 - 1,495	4.45%
24	\$334 - \$633	4.94%	\$150 - \$256	3.78%	\$416 - \$807	4.48%	\$287 - \$512	4.31%	\$247 - \$460	4.42%	595 - 1,079	4.69%
25	Up to \$334	6.15%	Up to \$150	4.31%	Up to \$416	5.54%	Up to \$287	4.94%	Up to \$247	5.17%	Up to 595	5.53%

Proxy Group of Six
Water Companies

Blue Granite Water
Company

Indicated Risk
Premium

Portfolio
Ranking

Portfolio
Ranking

Portfolio
Ranking

Portfolio
Ranking

Portfolio
Ranking

Portfolio
Ranking

Portfolio
Ranking

Portfolio
Ranking

Sources of Information:

Duff & Phelps 2019 Cost of Capital Navigator
SNL Financial
Company Form 10-K

B-8 Value

B-7 Value

B-5 Value

B-4 Value

B-2 Value

B-1 Value

B-8 Value

B-8 Value